

s.16(2)

s.19(1)

Archived: February 28, 2022 3:37:55 AM

From: Brisebois.Eve

Sent: Wed, 25 Aug 2021 09:34:33

To: Wakeman.Scott; Haymes.Michael; Watson.Greg; Savage.Renaud; Sam-Daliri.Rasa

Subject: Lighthouse Process Flow Draft

Sensitivity: Normal

Attachments:

Lighthouse Process Flow.docx;

Good morning,

Please see attached a new draft for the LH process flow, including the newly created org ID and upcoming participants in the pilot. Feel free to play in it and adapt to IN/DN's needs.

We can also have a quick review of it with the participants later today to have their input, especially for the TBD by Office sections. Just a thought ☺

Thanks!

Eve Brisebois (she/elle)

Teleworking / Télétravail

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Pages 2 to / à 3
are withheld pursuant to sections
sont retenues en vertu des articles

16(1)(b), 16(1)(c)

of the Access to Information Act
de la Loi sur l'accès à l'information

Haymes.Michael

From: Gonzalez.Steven
Sent: November 17, 2021 12:20 PM
To: Haymes.Michael; Ryu.Jae-Jin
Subject: RE: LH becoming permanent?

Thanks for the updates.

I like the idea of a roundtable discussion with directors as observers.

Thanks!

Steven Gonzalez

Acting Director, Advanced Analytics Solutions Centre (A²SC)
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Directeur par intérim, Centre de solutions en analytique avancée (CSA²)
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Steven.Gonzalez@cic.gc.ca / Tél: 626-607-3443

From: Haymes.Michael
Sent: Wednesday, November 17, 2021 11:11 AM
To: Gonzalez.Steven ; Ryu.Jae-Jin
Subject: RE: LH becoming permanent?

Not sure how you guys feel about this, but I proposed to Rasa following today's LH meeting the idea of having a bit of a directed roundtable discussion session in mid-December to close out the project and roll up any lessons learned and the good/bad, and inviting some directors from the relevant teams to observe or ask questions directly of the working group. This would give the participants a chance to directly communicate their thoughts on the tool to management (rather than it all getting rolled up through me or Rasa or some generic report).

For me, this working group put in a lot of work and hours on this, and it seems like a nice practice to let them voice their own experience directly to management without going through a filter. And it's a nice way to close out a pilot. As a side note, I fully expect the feedback to be very positive so I think it will look good for LH/A2SC as well.

What do you think?

Michael Haymes

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Michael.Haymes@cic.gc.ca / Tél.: 613-437-8909

From: Haymes.Michael

Sent: November 17, 2021 8:13 AM

To: Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Subject: RE: LH becoming permanent?

Liz Stronach is supposed to reach out to you guys to set up a meeting to discuss exactly this. According to Rasa, you should get that invite soon (but I'll perhaps ask him to move it up a bit). At the working level, there is support for continuing the project. As discussed previously, two things have been raised:

- 1) IRM wants to be the primary client

This is what Liz is going to propose at that meeting.

- 2) The network RAOs at the working level appear to like the IRM concept above, but also want to ensure that they have continued access to LH information and don't want to have everything flow solely through IRM.
- 3) My own personal view is that A2SC should not be involved in any administration relating to LH and should just be a provider of neutral information to inform others and let them perform their own reviews and determine appropriate action according to their existing authorities. So I'd like us to limit our world to producing the information, and leave the responsibility for how it is used exclusively to the clients (IRM/RAO, etc.).

So this is where things are at. Please consider this a

Mike

Michael Haymes

Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance
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From: Gonzalez.Steven

Sent: November 16, 2021 9:45 PM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Haymes.Michael <Michael.Haymes@cic.gc.ca>

Subject: LH becoming permanent?

Hi there,

Have there been any concrete discussions about making LH permanent after the pilot ends? I would expect IRM to lead that conversation since they "own" LH.

If it becomes permanent, we need to think about updating the digital transparency webpage to include a mention of LH.

Thanks,

Steven Gonzalez

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Haymes.Michael

From: Haymes.Michael
Sent: June 11, 2021 5:18 PM
To: Gonzalez.Steven; Wakeman.Scott
Cc: Haymes.Michael
Subject: RE: Lighthouse

Follow Up Flag: Follow up
Flag Status: Completed

Hi Steven,

Here are the bullets as recommended. Hopefully it's short enough. Feel free to adjust if you want or let us know if there are other pieces you want us to add/revise.

- Lighthouse is designed to strengthen program integrity through two primary functions: (1) it automatically identifies and summarizes fraud patterns in historical application data; and (2) it presents this information to risk assessment officers whenever a new application matches against a pattern at intake.
- A2SC is seeking approval for an 18-week global pilot of the system on the SP business line, involving the provision of fraud pattern information on approximately 1800 new applications.
- Under the pilot design, the sole use of this information would be to inform decisions by risk assessment officers about when to seek third-party verification of information submitted in an application. No final application decision is ever based directly on information provided by Lighthouse, and front-line decision-makers never see pattern information, nor are they made aware which applications matched against historical fraud patterns.

Michael Haymes

From: Gonzalez.Steven
Sent: June 10, 2021 6:47 PM
To: Haymes.Michael ; Wakeman.Scott
Subject: Lighthouse

Just spoke to Blair.

He doesn't think we need to go to any more committees. He wants to raise it with the ADM during their bilat next week. Blair would appreciate some bullets that could double as speaking notes. What would be the key points to raise with the ADM in 3-4 bullets max?

One bullet should concisely describe what the pilot is about.

One bullet should be about legal risks because Blair just asked me about it. ☺ We should say that we've worked very closely with Legal to identify and mitigate risks. Then describe the one risk that seems to be highest in Legal's mind and what we've done to mitigate.

I don't know when the bilat occurs, so let's aim to have some bullets by Monday morning at the latest.

Thanks!

Steven

Haymes.Michael

From: Haymes.Michael
Sent: July 5, 2021 3:50 PM
To: El-Kass.Wassim; Guan.Na
Subject: RE: Lighthouse Governance /Signatories

Seems to be just FYI. Does Blair want anything specific on this?

Mike
Michael Haymes

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Michael.Haymes@cic.gc.ca / Tél.: 613-437-8909

From: El-Kass.Wassim
Sent: July 5, 2021 1:18 PM
To: Haymes.Michael ; Guan.Na
Subject: FW: Lighthouse Governance /Signatories

----- Original message -----

From: "Haddock.Blair" <Blair.Haddock@cic.gc.ca>
Date: 2021-07-05 12:46 p.m. (GMT-05:00)
To: "El-Kass.Wassim" <Wassim.El-Kass@cic.gc.ca>
Cc: "Brothers.Bradley" <Bradley.Brothers@cic.gc.ca>
Subject: FW: Lighthouse Governance /Signatories
For action

From: OPP DGO / BDG PRO (IRCC)
Sent: July 5, 2021 10:43 AM
To: Haddock.Blair <Blair.Haddock@cic.gc.ca>
Cc: Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; OPP DGO / BDG PRO (IRCC) <IRCC.OPPDGO-BDGPRO.IRCC2@cic.gc.ca>; El-Kass.Wassim <Wassim.El-Kass@cic.gc.ca>
Subject: FW: Lighthouse Governance /Signatories
FYI
Andree-Anne Rochon

Governance Coordinator, Operations Planning and Performance
Immigration, Refugees and Citizenship Canada / Government of Canada
Andree-Anne.Rochon@cic.gc.ca / Tel: 613-437-9450

Coordonnatrice de la gouvernance, Planification et rendement des opérations
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Andree-Anne.Rochon@cic.gc.ca / Tél.: 613-437-9450

From: IRM DGO / BDG GRI (IRCC)
Sent: Monday, July 5, 2021 8:49 AM
To: OPP DGO / BDG PRO (IRCC) <IRCC.OPPDGO-BDGPRO.IRCC2@cic.gc.ca>
Cc: IRM DGO / BDG GRI (IRCC) <IRCC.IRMDGO-BDGGRI.IRCC@cic.gc.ca>
Subject: FW: Lighthouse Governance /Signatories

Hello OPP

At his bilat with Blair, Alain had provided the below updates on Lighthouse Governance/ Signatories.

I believe Alain had agreed to provide Blair with an update as to the expected date on which the memo and framework will be ready for DG review.

Please note that the team suggests the memo and framework should be ready for DG review by third week of July (tentatively).

Thanks,

Sarah

Topic: Lighthouse Governance / Signatories

Issue:

- Given branch's recent leadership in Lighthouse initiatives, IRM can become the main business/governance authority for the tool, as OPPB wants to remain involved primarily as the technical designer of the tool while transitioning its business governance to another branch.

Context:

- IRM is currently wrapping up the framework consultation which will be distributed for Director level approvals next week, before routing for DG level approval. For DG level, IRM proposes that members comprised of the Working Group endorse the framework vis-à-vis a DG memo for all to sign off.
- Unlike the AA models, the Lighthouse initiatives do not require an Officer of Record, as eligibility decisions will still be made by officers. In other words, these projects do not involve automated decision-making.
- The completion and DG-level approvals of such framework would allow the tool to be used with more flexibility, as long as the usage would not deviate from the framework and remain in compliance with the agreed-upon principles.

Key Discussion Points:

- OPPB (working-level) had suggested that, given the risk-related nature of the tool and its focus on admissibility issues, IRM would be a suitable fit to take on the business governance role as the primary authority.
- IRM is currently invested in providing functional/technical guidance on Lighthouse to Networks and OPPB, and drafting of the governance framework. IRM's DG is also involved through DESC which oversees the approval of Lighthouse data.
- Leading the tool's business governance and its usage is beneficial to the branch as it can subsequently result in positive processing and risk-management efficiencies.
- Additionally, IRM's role as the authority responsible for governing the usage as well as approving all new major changes would give some assurance on consistencies in operational delivery and approach given that computer analytics have received considerable public scrutiny. Consultation with the Lighthouse Working Group, comprised of Legal Services, ATIP, SPPB, CDOB and Operations Sector branches, will continue and IRM will be the primary authority responsible for the process.

Archived: February 28, 2022 3:37:59 AM
From: ATIP Internal / Interne AIPRP (IRCC)
Sent: Thu, 18 Feb 2021 10:11:16
To: Wakeman.Scott
Cc: Dunn.Amy; Matheson.Brianne; Haymes.Michael; Parkinson.Joshua; Sam-Daliri.Rasa
Subject: RE: PNA | A2SC Watchtower SP Pilot
Sensitivity: Normal

Thank-you for completing this Privacy Needs Assessment (PNA).

Your PNA is registered for processing and is included in our inventory of privacy assessments. Please note review is conducted on a priority basis. We will respond with recommendations as soon as we can.

Your file reference number is P202102-10.

Thanks,

Imal Jayanetti

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IRCC.ATIPInternal-InterneAIPRP.IRCC@cic.gc.ca

From: Wakeman.Scott
Sent: February 15, 2021 6:11 PM
To: ATIP Internal / Interne AIPRP (IRCC)
Cc: Dunn.Amy ; Matheson.Brianne ; Haymes.Michael ; Parkinson.Joshua ; Sam-Daliri.Rasa
Subject: PNA | A2SC Watchtower SP Pilot

Hello ATIP team,

Please find attached the PNA for the upcoming pilot of our Watchtower risk pattern detection model in the SP caseload (expected launch March 1).

Joshua Parkinson from CN's Risk Assessment Coordination Unit, CC'd on this email, will serve as the program lead for this PNA, and his Director is Ellie Weber.

Many thanks,

Scott.

Scott Wakeman

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Analyste Senior, Centre de solutions en analytique avancée (CSA²), Planification et rendement des opérations
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Archived: February 28, 2022 3:38:03 AM

From: Bosa, Keven (STATCAN)

Sent: Wed, 24 Feb 2021 15:45:42

To: Ryu.Jae-Jin

Cc: Haymes.Michael; Maranda, Guillaume (STATCAN); Beaulieu, Martin-J (STATCAN); Beaucage, Yanick (STATCAN)

Subject: RE: Review of the Watchtower project

Sensitivity: Normal

Thank you for the quick answer. We'll be waiting your report.

Keven

De : Ryu.Jae-Jin [mailto:Jae-Jin.Ryu@cic.gc.ca]

Envoyé : February 24, 2021 1:41 PM

À : Bosa, Keven (STATCAN)

Cc : Haymes.Michael ; Maranda, Guillaume (STATCAN) ; Beaulieu, Martin-J (STATCAN) ; Beaucage, Yanick (STATCAN)

Objet : RE: Review of the Watchtower project

Hi Keven,

Yes, thanks for following up. We've had some IT-related issues in the last few weeks, which caused unexpected delays. We will send you the report this week.

Regards,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch
Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow
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Jae-Jin.Ryu@cic.gc.ca / Tél.: 343-551-2190

From: Bosa, Keven (STATCAN) [mailto:keven.bosa@canada.ca]

Sent: February 24, 2021 1:10 PM

To: Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Hi Jae-Jin,

I hope everything is fine on your side. I'm writing to you regarding the Watchtower report that we are supposed to receive in order for us to proceed with the peer review. When we get the report, we can quickly look at it and give you some timelines concerning the review process.

Sincerely,

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique

Statistique Canada / Gouvernement du Canada

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Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field

Statistics Canada / Government of Canada

keven.bosa@canada.ca / Tel: 613-863-8964

De : Beaucage, Yanick (STATCAN)

Envoyé : February 10, 2021 9:21 AM

À : Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Bosa, Keven (STATCAN) <keven.bosa@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc : Haymes.Michael <Michael.Haymes@cic.gc.ca>

Objet : RE: Review of the Watchtower project

Hi Jae-Jin,

Everything is fine here, hope it is the case at IRCC as well. Thanks for the heads-up, we will be expecting your report.

Once we get it, we will first evaluate how long this review will take us and we will get back to you to make sure the timeline is good.

In terms of budget, we will not expect anything at this stage from you unless we evaluate for this task to take more than 20 days (which should not be the case).

Have a good day,

- Yanick

De : Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Envoyé : February 8, 2021 9:21 AM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc : Haymes.Michael <Michael.Haymes@cic.gc.ca>

Objet : RE: Review of the Watchtower project

Dear colleagues at STC,

Hope all is well. Just as a heads up, we are in the process of finalizing our project report for peer-review. We should be able to send it your way this week.

@Yanick, please let me know if you wish to discuss the financial aspect of this work. We have a small portion of our budget set aside for this.

Thanks,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch
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Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.: 343-551-2190

From: Ryu.Jae-Jin

Sent: December 22, 2020 3:46 PM

To: 'Bosa, Keven (STATCAN)' <keven.bosa@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Hello,

Thank you for meeting with us yesterday. We look forward to working with you on this.

For your information, please see the attached for the update report on Peer Review for Automated Decision Making. I believe this was the document that Yanick was referring to during the meeting.

Please do not hesitate to get in touch with us if you have additional question on Watchtower.

Happy holidays.

<< File: Bronson_Millar-Robust_Peer_Review_for_Automated_Decision_Making.docx >>

Jae-Jin Ryu, Ph.D.

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s.16(2)

s.19(1)

Archived: February 28, 2022 3:38:10 AM

From: Dunn.Amy

Sent: Wed, 10 Feb 2021 07:19:04

To: Wakeman.Scott; Kinoshita.Andrew; Kazmi.Hana; Matheson.Brianne; Sam-Daliri.Rasa

Cc: Ryu.Jae-Jin; Haymes.Michael; Afonso.Bruno

Subject: RE: Revised Charter | Watchtower SP Pilot #2

Sensitivity: Normal

Hi Scott,

Thanks for the confirmation. When I was looking at forms yesterday, I think I was in the wrong area and wasn't finding this.

I believe that yes this notice would cover the use of WT. It was written to be able to cover a wide range of 'computer analytics' systems and from my perspective the highlighted part as well as the following sentence that says it might be used also for risk management would also cover WT.

From my perspective, you can remove it from the charter.

Thanks,

Amy Dunn

Senior ATIP Policy Advisor, ATIP, Integrated Corporate Business
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From: Wakeman.Scott

Sent: February 9, 2021 1:44 PM

To: Dunn.Amy ; Kinoshita.Andrew ; Kazmi.Hana ; Matheson.Brianne ; Sam-Daliri.Rasa

Cc: Ryu.Jae-Jin ; Haymes.Michael ; Afonso.Bruno

Subject: RE: Revised Charter | Watchtower SP Pilot #2

Hi Amy,

Thanks for taking another look at the charter.

Re: the SP privacy notice, Steven clarified that it was updated under TRVM, and below is the relevant section from the SP application form. Do you consider this notice to be sufficient for the use of Watchtower, and if so, shall I remove this risk from the charter? Let me know how to proceed.

Have a good afternoon!

Scott.

PRIVACY NOTICE

Personal information provided on this form is collected and will be used, disclosed, and retained by Immigration, Refugees and Citizenship Canada (IRCC) under the authority of the Immigration and Refugee Protection Act (IRPA). The personal information provided will be used for the purpose of processing applications. The personal information provided may be disclosed to other federal government institutions and third parties including law enforcement bodies, provincial/territorial governments and/or foreign governments for the purpose of validating identity, eligibility and admissibility.

The personal information collected on an application, and other information collected in support of an application, may be used for computer analytics to support processing of applications and decision making, including your application. Personal information, including from computer analytics, may also be used for purposes including research, statistics, program and policy evaluation, internal audit, compliance, risk management, strategy development and reporting.

Where biometrics are provided in support of an application, the fingerprints collected will be stored and shared with the RCMP. The fingerprint record may also be disclosed to law enforcement agencies in Canada in accordance with subsection 13.1(1) of the Immigration and Refugee Protection Regulations. The information may be used to establish or verify the identity of a person in order to prevent, investigate, or prosecute an offence under any law of Canada or a Province. This information may also be used to establish or verify the identity of an individual whose identity cannot reasonably be otherwise established or verified because of physical or mental condition. Canada may also share immigration information related to biometric records with foreign governments with whom Canada has an agreement or arrangement.

Failure to complete the form in full may result in a delay or the application not being processed. The Privacy Act gives individuals the right of access to, protection, and correction of their personal information. Further details are available in Info Source. If you are not satisfied with the manner in which IRCC handles your personal information, you may exercise your right to file a complaint to the Office of the Privacy Commissioner of Canada. The collection, use, disclosure and retention of your personal information is further described in IRCC's personal information bank - IRCC PPI 051.

From: Dunn.Amy

Sent: February 9, 2021 7:21 AM

To: Wakeman.Scott <Scott.Wakeman@cic.gc.ca>; Kinoshita.Andrew <Andrew.Kinoshita@cic.gc.ca>; Kazmi.Hana <Hana.Kazmi@cic.gc.ca>; Matheson.Brianne <Brianne.Matheson@cic.gc.ca>; Sam-Daliri.Rasa <Rasa.Sam-Daliri@cic.gc.ca>

Cc: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Haymes.Michael <Michael.Haymes@cic.gc.ca>; Afonso.Bruno <Bruno.Afonso@cic.gc.ca>

A-2021-18628-000014

Subject: RE: Revised Charter | Watchtower SP Pilot #2

s.16(2)

Hi Scott,

s.19(1)

The updated charter looks great to me!

I only have one comment to make for your consideration. The risk about the privacy notice “Applicants are unaware that IRCC may use a model to support the processing of their application” still has the mitigation that the SP privacy notice has already been updated, but I’m not certain that is the case. If you did check, can you confirm with me that it’s been updated? If it hasn’t been updated or you haven’t checked yet, then I suggest modifying the mitigation to reflect the current status. Perhaps something like : “During the pilot, the SP privacy notice will be reviewed to ensure that it accurately informs clients that computer analytics may be used to support the processing of their application. A2SC will discuss this matter further with ATIP during the pilot.” We do plan on checking and updating it if and as required, so I think that’s an accurate statement.

As always, I’m happy to chat more if you’d like.

Thanks,

Amy Dunn

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Amy.Dunn@cic.gc.ca / Tél.: (no voicemail)

From: Wakeman.Scott

Sent: February 4, 2021 9:47 AM

To: Kinoshita.Andrew <Andrew.Kinoshita@cic.gc.ca>; Kazmi.Hana <Hana.Kazmi@cic.gc.ca>; Dunn.Amy <Amy.Dunn@cic.gc.ca>; Matheson.Brianne <Brianne.Matheson@cic.gc.ca>; Sam-Daliri.Rasa <Rasa.Sam-Daliri@cic.gc.ca>

Cc: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Haymes.Michael <Michael.Haymes@cic.gc.ca>; Afonso.Bruno <Bruno.Afonso@cic.gc.ca>

Subject: Revised Charter | Watchtower SP Pilot #2

Morning all,

Thanks again for your input on this.

The revised draft is ready for your review: <http://gcdocs2.ci.gc.ca/otcs/cs.exe/Overview/388781359>

Please scan the revisions and add or email any final comments.

Have a great day,

Scott.

Scott Wakeman

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Immigration, Refugees and Citizenship Canada / Government of Canada
Scott.Wakeman@cic.gc.ca / Tel: 613-437-9824

Analyste Senior, Centre de solutions en analytique avancée (CSA²), Planification et rendement des opérations
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s.16(1)(c)

s.16(2)

s.21(1)(b)

s.19(1)

Archived: February 28, 2022 3:38:16 AM

From: Bigio.Benjamin

Sent: Tue, 3 Nov 2020 09:01:33

To: Haymes.Michael

Cc: IPG Student Unit Admin / Admin Unité des étudiants OPI (IRCC); Gonzalez.Steven; Cyr.Eugenie

Subject: RE: watchtower project

Sensitivity: Normal

Hi Michael,

Happy to support the project.

Eugenie Cyr will be the main point of contact from our team, as it relates to a 'digital' project of sorts.

Thank you,

Benjamin Bigio

Assistant Director, Immigration Program Guidance
Immigration, Refugees and Citizenship Canada / Government of Canada
Benjamin.Bigio@ci.gc.ca / Tel:

Directeur adjoint, Orientation du programme d'immigration
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Benjamin.Bigio@ci.gc.ca / Tél.:

From: Haymes.Michael

Sent: Monday, November 2, 2020 7:54 PM

To: Bigio.Benjamin

Cc: IPG Student Unit Admin / Admin Unité des étudiants OPI (IRCC) ; Gonzalez.Steven

Subject: watchtower project

Hi Ben,

I don't believe we've met. My name is Mike Haymes. I'm a data scientist with IRCC's Advanced Analytics Solution Centre (in OPPB). I'm reaching out relating to a prototype product that we've developed called Watchtower. In a nutshell, Watchtower is a prototype system that is capable of automatically extracting risk patterns from IRCC data holdings. We've been working with various stakeholders over the past year or so, and the system has demonstrated fairly strong effectiveness in automatically detecting organized fraud patterns in the SP line.

Given your team's specific focus on SP, I'm wondering if you or someone from your team would be available to participate in this project?

I've attached a copy of the project charter for this project, which should provide additional details:

<http://gcdocs2.ci.gc.ca/otcs/cs.exe/link/380179049>

If you're free sometime this week, I'd be happy to set up a call to more properly introduce myself and the project and provide a lot more context for the work. I'd also be happy to provide a short demo of the technology which I think will give you a much better idea of what I'm talking about. Let me know and I'll set it up.

Cheers,

Mike

Michael Haymes
Data Scientist, Advanced Analytics Solutions Centre (A2SC)
Immigration, Refugees and Citizenship Canada / Government of Canada
Michael.Haymes@ci.gc.ca

Scientifique des données, Centre de solutions en analytique avancée (CSA2)
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Michael.Haymes@cic.gc.ca

Haymes.Michael

From: Haymes.Michael
Sent: February 24, 2021 1:01 PM
To: Ryu.Jae-Jin
Cc: Gonzalez.Steven; Wakeman.Scott
Subject: FW: Legal Assessment - Opinion - 2021-02-23
Attachments:

Jae-Jin/Steven,

Andrew has provided his legal opinion (). I'm still reviewing this through. There are some mitigation pieces we can do, but what I've read so far is very on the mark and there are no showstoppers. Once we've done a more thorough review, Scott and I will provide an email with some more specifics on the mitigation aspects later today.

Mike

Michael Haymes

, Operations Planning and Performance
 Immigration, Refugees and Citizenship Canada / Government of Canada
Michael.Haymes@cic.gc.ca / Tel: 613-437-8909

, Planification et rendement des opérations
 Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Michael.Haymes@cic.gc.ca / Tél.: 613-437-8909

From: Campagna.Rebecca
Sent: February 24, 2021 11:00 AM
To: Haymes.Michael ; Wakeman.Scott
Cc: Kinoshita.Andrew
Subject: Legal Assessment Opinion - 2021-02-23

Good morning Mr. Haymes and Mr. Wakeman,

Please find attached the completed opinion by Andrew Kinoshita: "Legal Assessment

Merci beaucoup,

Rebecca Campagna

Legal Assistant, Legal Services (IRCC)
 Immigration, Refugees and Citizenship Canada / Government of Canada
Rebecca.Campagna@cic.gc.ca / ☎ 613-252-9837

Services juridiques (IRCC)
 Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Rebecca.Campagna@cic.gc.ca / ☎ 613-252-9837

Pages 19 to / à 45
are withheld pursuant to section
sont retenues en vertu de l'article

23

of the Access to Information Act
de la Loi sur l'accès à l'information

Haymes.Michael

From: Gonzalez.Steven
Sent: September 8, 2021 4:34 PM
To: Ryu.Jae-Jin; Haymes.Michael
Subject: FW: Lighthouse Tool Governance Update

FYI

From: Desruisseaux.Alain
Sent: Wednesday, September 8, 2021 2:13 PM
To: Giles.Nicole ; Mills.Daniel
Cc: Baril.Andre ; Dorion.Marie-Josée ; Stronach.Elizabeth ; Gonzalez.Steven ; IRCC.F ADMO Operations / Opérations BSMA F.IRCC
Subject: Lighthouse Tool Governance Update

Dear Nicole and Daniel,

I'm writing to provide you an update on the governance surrounding the Lighthouse processing tool. We have a briefing on Lighthouse scheduled in the coming weeks; however, I thought I would give you a heads up on some key developments.

As you know, the demand for AI solutions to assist with the Department's program delivery has been steadily increasing, primarily to address challenges in volume management. Lighthouse, formerly known as Watchtower is an AI-based risk indicator solution that has been developed to automatically and comprehensively extract risk and fraud patterns from source data. Lighthouse does not make recommendations or render administrative decisions about clients or their applications. Nonetheless, measures have been taken to ensure that human intervention is part of every stage of the tool's application.

In the last few months, IRM has led the development of a governance framework to set priorities for Lighthouse's use, explain its processes, outline related roles and responsibilities, and ensure transparency in the usage of the tool. In this way, the general principles of the tool on its usage and governance are upon in advance, which will facilitate procedures and expedite implementation of the tool. The framework has been developed in close collaboration with key stakeholders including OPP, the Networks, IPG, and CMB. In addition, considerable consultation and advice was also received from Admissibility Branch, SPPB, ATIP Division, DLSU, IAAB, and CDO to ensure we cover all our bases.

As noted in the framework, business ownership of Lighthouse will be shared between OPPB and IRM going forward. OPPB will be responsible for the tool's technical design and record-keeping as it relates to the design and configuration data of the tool, ensuring that the privacy and legal requirements and recommendations are followed. IRM will be responsible for operationalizing the program-level aspects of the tool's findings as well as maintaining administrative aspects of the tool, such as quality management and ensuring the governance framework remains evergreen. Furthermore, CDO will seek approval on data inputs specific to each implementation or pilot from the Data Executive Steering Committee (DESC), who will in turn inform Issues Management Committee (IMC). The processing networks and their Risk Assessment Units will operationalize case specific aspects of the tool's findings.

For your info, I am happy to share a copy of the Lighthouse governance framework, which has been e-approved at the DG level and is now in force. Let me know if you have any questions or concerns.

Lighthouse Governance Framework - Final Draft - DG Approved:

<https://gcdocs2.ci.gc.ca/otcs/cs.exe?func=ll&objaction=overview&objid=416633523>

s.16(2)

Thanks,

s.19(1)

Alain

Alain Desruisseaux

Director General, Integrity Risk Management (IRM)
Immigration, Refugees and Citizenship Canada / Government of Canada
Alain.Desruisseaux@cic.gc.ca

Directeur général, Gestion des risques pour l'intégrité (GRI)
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Alain.Desruisseaux@cic.gc.ca

Iphone:

Haymes.Michael

From: Haymes.Michael
Sent: November 25, 2021 6:59 PM
To: Ryu.Jae-Jin
Subject: FW: Review of the Watchtower project
Attachments: peer_review_response.xlsx

Michael Haymes

Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance
Immigration, Refugees and Citizenship Canada / Government of Canada

From: Haymes.Michael
Sent: June 24, 2021 11:06 AM
To: 'Bosa, Keven (STATCAN)' ; Ryu.Jae-Jin
Cc: Beaucage, Yanick (STATCAN) ; Guan.Na ; Gonzalez.Steven
Subject: RE: Review of the Watchtower project

Hi Keven,

Here is the response document to the recommendations that I mentioned. Happy to meet and discuss next week, please propose a time that works on your end and we will accommodate.

The other project relates to triaging of some low-risk/complexity applicants to our family class business line. We will share some additional supporting documentation relating to this project shortly (Na, let's discuss).

Cheers,

Mike

Michael Haymes

A/Assistant Director, Advanced Analytics Solutions Centre (A2SC), Operations Planning and Performance
Immigration, Refugees and Citizenship Canada / Government of Canada
Michael.Haymes@cic.gc.ca / Tel: 613-437-8909

From: Bosa, Keven (STATCAN) [<mailto:keven.bosa@canada.ca>]
Sent: June 24, 2021 7:49 AM
To: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>
Cc: Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Guan.Na <Na.Guan@cic.gc.ca>; Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>
Subject: RE: Review of the Watchtower project

Hi Michael,

I'm happy to hear back from you. If you can share your response document addressing our recommendations, it will be nice. I can set up a meeting next week to go over the recommendations we've made. Who should I invite on your side for this meeting?

For the second project to review, we can discuss it during the meeting. If you have documentation on the methodology and the ethical risks that you can share, don't hesitate to send it to us. I might help to the discussion and to plan.

Have a good day and thank you for reaching us.

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique
Statistique Canada / Gouvernement du Canada
keven.bosa@canada.ca / Tél. : 613-863-8964

Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field
 Statistics Canada / Government of Canada
keven.bosa@canada.ca / Tel: 613-863-8964

De : Haymes.Michael [<mailto:Michael.Haymes@cic.gc.ca>]

Envoyé : June 21, 2021 12:10 PM

À : Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Bosa, Keven (STATCAN) <keven.bosa@canada.ca>

Cc : Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Guan.Na <Na.Guan@cic.gc.ca>; Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>

Objet : RE: Review of the Watchtower project

Hi Keven,

Sorry about the delayed response on this. Jae-Jin and I'm acting in her stead for the next two months. If you are free, I'd like to touch base on this meeting that was discussed and to go through the recommendations around Watchtower that you provided. I've drafted a response document that addresses pieces of it, which I can share and we can discuss a bit further.

As a separate issue, our team has launched another project that we are seeking out a partner to conduct a peer review (as required by the TBS directive). It's a low-risk model that automates one stage of our processing using a relatively small set of business rules (identified using ML). If your team has some availability we can discuss this separate project and perhaps kick off an agreement around that. I can provide more context around this project at the meeting if that helps. Let me know what you think.

Cheers,

Mike

Michael Haymes

Operations Planning and Performance

Immigration, Refugees and Citizenship Canada / Government of Canada

Michael.Haymes@cic.gc.ca / Tel: 613-437-8909

Planification et rendement des opérations

Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada

Michael.Haymes@cic.gc.ca / Tél.: 613-437-8909

From: Ryu.Jae-Jin

Sent: May 5, 2021 3:20 PM

To: 'Bosa, Keven (STATCAN)' <keven.bosa@canada.ca>

Cc: Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Haymes.Michael <Michael.Haymes@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Hi Keven,

Thank you very much for the review. We will go over it more carefully in the next little while.

Just to clarify and make preparations on our end, the objective of the proposed meeting is to go over your recommendations? If so, anytime in the next couple of weeks would work for us.

Looking forward to our chat.

Regards,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

Immigration, Réfugiés et Citoyenneté Canada

Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Bosa, Keven (STATCAN) [<mailto:keven.bosa@canada.ca>]

Sent: May 5, 2021 11:01 AM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Cc: Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>

Subject: RE: Review of the Watchtower project

Good morning Jae-Jin,

I hope you are doing well. Attach in this email, you will find our peer review report of the Watchtower project. This report is considered a draft version since we might update some recommendations following a meeting with your team and potentially getting an updated version of the documentation. The next step will be to have a meeting to go over the recommendations in the report. As I mention before, I will also invite Benoit Deshaies from TBS in this meeting in order to know his thoughts about the review process. Also, this process is pretty new and we can learn from that for future reviews.

Regards,

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique

Statistique Canada / Gouvernement du Canada

keven.bosa@canada.ca / Tél. : 613-863-8964

Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field
 Statistics Canada / Government of Canada

keven.bosa@canada.ca / Tel: 613-863-8964

De : Ryu.Jae-Jin [<mailto:Jae-Jin.Ryu@cic.gc.ca>]

Envoyé : April 27, 2021 1:33 PM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>

Objet : RE: Review of the Watchtower project

Sounds good. Thanks !

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel. :

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

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Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Bosa, Keven (STATCAN) [<mailto:keven.bosa@canada.ca>]

Sent: April 27, 2021 12:57 PM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Hi Jae-Jin,

Actually, my plan is to have a meeting short after we send you the report. Also, Benoit Deshaies from TBS might be interested to attend our meeting if you agree.

Keven

De : Ryu.Jae-Jin [<mailto:Jae-Jin.Ryu@cic.gc.ca>]

Envoyé : April 27, 2021 12:17 PM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>

Objet : RE: Review of the Watchtower project

Hi Keven,

Certainly. Please see the attached. Let us know if anything else is required.

Just as a heads up, once the peer-review of Watchtower comes through, we would like to discuss some recent developments on our projects. But this discussion can wait.

Looking forward to the review!

Regards,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

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Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Bosa, Keven (STATCAN) [mailto:keven.bosa@canada.ca]

Sent: April 27, 2021 11:04 AM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Good morning Jae-Jin,

We are almost done with the report. Sorry, it took more time than expected. Will it be possible to have your completed AIA so we can confirm the score. It was a recommendation of the document of the [redacted]. We have tried to fill it in an independent fashion, but we don't have all the information to do it.

Thank you,

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique
 Statistique Canada / Gouvernement du Canada
keven.bosa@canada.ca / Tél. : 613-863-8964
 Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field
 Statistics Canada / Government of Canada
keven.bosa@canada.ca / Tel: 613-863-8964

De : Ryu.Jae-Jin [mailto:Jae-Jin.Ryu@cic.gc.ca]

Envoyé : April 1, 2021 1:34 PM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>

Objet : RE: Review of the Watchtower project

Great. Thank you!

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

Immigration, Réfugiés et Citoyenneté Canada

Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Bosa, Keven (STATCAN) [mailto:keven.bosa@canada.ca]

Sent: April 1, 2021 11:08 AM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>

Subject: RE: Review of the Watchtower project

Hi Jae-Jin,

We are currently working on it. We should have a report to share with you in two weeks.

Happy Easter!

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique
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 Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field
 Statistics Canada / Government of Canada
keven.bosa@canada.ca / Tel: 613-863-8964

De : Ryu.Jae-Jin [<mailto:Jae-Jin.Ryu@cic.gc.ca>]

Envoyé : April 1, 2021 11:01 AM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>

Cc : Haymes.Michael <Michael.Haymes@cic.gc.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>

Objet : RE: Review of the Watchtower project

Hello Keven,

Hope all is well. I wanted to see when we can expect to have your comments on Watchtower. No rush – we just need this info for planning. Any Qs, please feel free to reach out.

Have a good long weekend!

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

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Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Bosa, Keven (STATCAN) [<mailto:keven.bosa@canada.ca>]

Sent: February 26, 2021 8:23 AM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>

Subject: RE: Review of the Watchtower project

Thank you very much Dr. Ryu,

I want to acknowledge that we receive your document and we will start working on the review soon.

Regards,

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique

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Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field

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keven.bosa@canada.ca / Tel: 613-863-8964

De : Ryu.Jae-Jin [<mailto:Jae-Jin.Ryu@cic.gc.ca>]

Envoyé : February 25, 2021 3:54 PM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>

Cc : Haymes.Michael <Michael.Haymes@cic.gc.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>

Objet : RE: Review of the Watchtower project

Hi,

As promised, please see the attached for our documentation on Watchtower (apologies for the file size!)

We look forward to your comments.

Regards,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

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Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Ryu.Jae-Jin

Sent: February 24, 2021 1:41 PM

To: 'Bosa, Keven (STATCAN)' <keven.bosa@canada.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>

Subject: RE: Review of the Watchtower project

Hi Keven,

Yes, thanks for following up. We've had some IT-related issues in the last few weeks, which caused unexpected delays. We will send you the report this week.

Regards,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel.:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

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Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Bosa, Keven (STATCAN) [<mailto:keven.bosa@canada.ca>]

Sent: February 24, 2021 1:10 PM

To: Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>;

Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Hi Jae-Jin,

I hope everything is fine on your side. I'm writing to you regarding the Watchtower report that we are supposed to receive in order for us to proceed with the peer review. When we get the report, we can quickly look at it and give you some timelines concerning the review process.

Sincerely,

Keven Bosa

Chef — Division de la science des données, Secteur des études analytiques, de la méthodologie et de l'infrastructure statistique

Statistique Canada / Gouvernement du Canada

keven.bosa@canada.ca / Tél. : 613-863-8964

Chief – Data Science Division, Analytical Studies, Methodology and Statistical Infrastructure Field

Statistics Canada / Government of Canada

keven.bosa@canada.ca / Tel: 613-863-8964

De : Beaucage, Yanick (STATCAN)

Envoyé : February 10, 2021 9:21 AM

À : Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>; Bosa, Keven (STATCAN)

<keven.bosa@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc : Haymes.Michael <Michael.Haymes@cic.gc.ca>

Objet : RE: Review of the Watchtower project

Hi Jae-Jin,

Everything is fine here, hope it is the case at IRCC as well. Thanks for the heads-up, we will be expecting your report.

Once we get it, we will first evaluate how long this review will take us and we will get back to you to make sure the timeline is good.

In terms of budget, we will not expect anything at this stage from you unless we evaluate for this task to take more than 20 days (which should not be the case).

Have a good day,

- Yanick

De : Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Envoyé : February 8, 2021 9:21 AM

À : Bosa, Keven (STATCAN) <keven.bosa@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc : Haymes.Michael <Michael.Haymes@cic.gc.ca>

Objet : RE: Review of the Watchtower project

Dear colleagues at STC,

Hope all is well. Just as a heads up, we are in the process of finalizing our project report for peer-review. We should be able to send it your way this week.

@Yanick, please let me know if you wish to discuss the financial aspect of this work. We have a small portion of our budget set aside for this.

Thanks,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations

Immigration, Réfugiés et Citoyenneté Canada

Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Ryu.Jae-Jin

Sent: December 22, 2020 3:46 PM

To: 'Bosa, Keven (STATCAN)' <keven.bosa@canada.ca>; Beaulieu, Martin-J (STATCAN) <martin-j.beaulieu@canada.ca>; Beaucage, Yanick (STATCAN) <yanick.beaucage@canada.ca>; Maranda, Guillaume (STATCAN) <guillaume.maranda@canada.ca>

Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>

Subject: RE: Review of the Watchtower project

Hello,

Thank you for meeting with us yesterday. We look forward to working with you on this. For your information, please see the attached for the update report on Peer Review for Automated Decision Making. I believe this was the document that Yanick was referring to during the meeting.

Please do not hesitate to get in touch with us if you have additional question on Watchtower.

Happy holidays.

<< File:

Peer_Review_for_Automated_Decision_Making.docx

>>

Jae-Jin Ryu, Ph.D.

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s.16(2)

s.21(1)(b)

s.19(1)

Haymes.Michael

From: Stronach.Elizabeth
Sent: August 4, 2021 9:52 AM
To: Gonzalez.Steven; El-Kass.Wassim
Cc: Haymes.Michael; Sam-Daliri.Rasa
Subject: RE: (for director approval) Lighthouse Governance Framework - by 27 July

Hi Steven (and Wassim), thanks again for this. Just closing the loop on the CDO issue. They were included at the request of SPPB, and their inclusion was noted in the various earlier drafts of the framework that circulated for comments before this one. As you suggest, we will adjust the framework to remove them as the lead for reviewing the data/variables (but leave them in the mix for coordinating for DESC and recommending potential changes as necessary, at their request.)

Many thanks again!

Elizabeth Stronach

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Elizabeth.Stronach@cic.gc.ca / Cell.:

TELEWORKING // EN TÉLÉTRAVAIL

From: Gonzalez.Steven
Sent: Tuesday, July 27, 2021 5:11 PM
To: Stronach.Elizabeth
Cc: Haymes.Michael
Subject: RE: (for director approval) Lighthouse Governance Framework - by 27 July

Hi Liz,

The framework is very comprehensive and well written. I have a few comments that partly reflect best practices that have already emerged around Lighthouse.

- Page 5 talks about the rules and variables being subject to ATIP. That's a good point. However, we should add a sentence immediately after stating something like: *"Nevertheless, details about rules and variables will continue to be exempted from ATIP requests given their link to investigative techniques used by IRCC (section 16)"*. ATIP Division has agreed with our rationale for exempting this information from past requests.

- The role for the CDO on page 3 doesn't seem to align with the governance discussions that transpired over the last 8-9 months. It doesn't seem to have emerged organically from the working group, but rather was added during the drafting. It doesn't align naturally with their mandate. As the secretariat for DESC, CDO can coordinate presentations to DESC when required, but I don't see much else for them in this governance framework. We already have many cooks in the kitchen. The review of data points and variables is much better entrusted to Legal, Privacy and IRM given their expertise in their respective areas.

Happy to discuss any of the above points.

Warm regards,

Steven Gonzalez

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Steven.Gonzalez@cic.gc.ca / Tél: 626-607-3443

From: Stronach.Elizabeth <Elizabeth.Stronach@cic.gc.ca>

Sent: Tuesday, July 27, 2021 1:07 PM

To: Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; Eales.Malcolm <Malcolm.Eales@cic.gc.ca>; Perry.Tracy <Tracy.Perry@cic.gc.ca>; Lipo.Ilir <Ilir.Lipo@cic.gc.ca>; Smith.Heidi <Heidi.Smith@cic.gc.ca>; McEvenue.Patrick <Patrick.McEvenue@cic.gc.ca>; Faucher.Paul <Paul.Faucher@cic.gc.ca>; Weber.Ellie <Ellie.Weber@cic.gc.ca>; Poulin.Sarah <Sarah.Poulin@cic.gc.ca>; Fleurant.Sebastien <Sebastien.Fleurant@cic.gc.ca>; Stewart.Robb <Robb.Stewart@cic.gc.ca>; Henderson.Victoria <Victoria.Henderson@cic.gc.ca>; Chung.Jae-Won <Jae-Won.Chung@cic.gc.ca>; Mann.Michelle <Michelle.Mann@cic.gc.ca>; Daponte.Andie <Andie.Daponte@cic.gc.ca>; Adams-Barrie.Bradley <Bradley.Adams-Barrie@cic.gc.ca>; Lemonde.Catherine <Catherine.Lemonde1@cic.gc.ca>
Cc: IRM TRIMA DO / BDO RTAGIGRI (IRCC) <IRCC.IRMTRIMADO-BDORTAGIGRI.IRCC2@cic.gc.ca>; Lee.Edwina <Edwina.Lee@cic.gc.ca>; IRCC.F CMB IECD DO / BD DECE DGRC F.IRCC <IRCC.CMBIECDDO-BDDECEEDGRC.IRCC@cic.gc.ca>; IRCC.F CMB Litigation Mgmt DO / BD Gest Litiges DGRC F.IRCC <IRCC.CMBLitigationMgmtDO-BDGestLitigesDGRC.IRCC@cic.gc.ca>; Dunn.Amy <Amy.Dunn@cic.gc.ca>; Wakeman.Scott <Scott.Wakeman@cic.gc.ca>; Haymes.Michael <Michael.Haymes@cic.gc.ca>; Rushton.Robin-Leah <Robin-Leah.Rushton@cic.gc.ca>; Parkinson.Joshua <Joshua.Parkinson@cic.gc.ca>; Savage.Renaud <Renaud.Savage@cic.gc.ca>; Heap.Susie <Susie.Heap@cic.gc.ca>; Wallace.Gary <Gary.Wallace@cic.gc.ca>; Mullen.Colleen <Colleen.Mullen@cic.gc.ca>; Matheson.Brianne <Brianne.Matheson@cic.gc.ca>; Kinoshita.Andrew <Andrew.Kinoshita@cic.gc.ca>; Turinov.Anna <Anna.Turinov@cic.gc.ca>; Richer.Benoit <Benoit.Richer@cic.gc.ca>; Blakely.Gregg <Gregg.Blakely@cic.gc.ca>; Morgan.Trevor <Trevor.Morgan@cic.gc.ca>; Merineau.Isabelle <Isabelle.Merineau@cic.gc.ca>; Nanavati.Taralee <Taralee.Nanavati@cic.gc.ca>; Cairncross.Emily <Emily.Cairncross@cic.gc.ca>; Avendano.Patricia <Patricia.Avendano@cic.gc.ca>; MacKinnon.Heather <Heather.MacKinnon@cic.gc.ca>; Thomas.Jessica <Jessica.Thomas@cic.gc.ca>; Chao.Kim <Kim.Chao@cic.gc.ca>; Pilon.Colette <Colette.Pilon@cic.gc.ca>; Chan-Kravitz.Anne <Anne.Chan-Kravitz@cic.gc.ca>; Sam-Daliri.Rasa <Rasa.Sam-Daliri@cic.gc.ca>; Bernier.Josh <Josh.Bernier@cic.gc.ca>; IRM TRIMA DO / BDO RTAGIGRI (IRCC) <IRCC.IRMTRIMADO-BDORTAGIGRI.IRCC2@cic.gc.ca>

Subject: RE: (for director approval) Lighthouse Governance Framework - by 27 July

Good afternoon colleagues – with many thanks to those who have provided their comments/approval, simply a request to kindly submit your own approvals and/or red-line comments by **COB today**. Let me know if any questions or concerns.

Thanks as always,

Liz

Elizabeth Stronach

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Elizabeth.Stronach@cic.gc.ca / Cell.: (

TELEWORKING // EN TÉLÉTRAVAIL

From: Stronach.Elizabeth

Sent: Wednesday, July 21, 2021 5:02 PM

To: Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; Eales.Malcolm <Malcolm.Eales@cic.gc.ca>; Perry.Tracy <Tracy.Perry@cic.gc.ca>; Lipo.Ilir <Ilir.Lipo@cic.gc.ca>; Smith.Heidi <Heidi.Smith@cic.gc.ca>; McEvenue.Patrick <Patrick.McEvenue@cic.gc.ca>; Faucher.Paul <Paul.Faucher@cic.gc.ca>; Weber.Ellie <Ellie.Weber@cic.gc.ca>; Poulin.Sarah <Sarah.Poulin@cic.gc.ca>; Fleurant.Sebastien <Sebastien.Fleurant@cic.gc.ca>; Stewart.Robb <Robb.Stewart@cic.gc.ca>; Henderson.Victoria <Victoria.Henderson@cic.gc.ca>; Chung.Jae-Won <Jae-Won.Chung@cic.gc.ca>; Mann.Michelle <Michelle.Mann@cic.gc.ca>; Daponte.Andie <Andie.Daponte@cic.gc.ca>; Adams-Barrie.Bradley <Bradley.Adams-Barrie@cic.gc.ca>; Lemonde.Catherine <Catherine.Lemonde1@cic.gc.ca>
Cc: IRM TRIMA DO / BDO RTAGIGRI (IRCC) <IRCC.IRMTRIMADO-BDORTAGIGRI.IRCC2@cic.gc.ca>; Lee.Edwina <Edwina.Lee@cic.gc.ca>; IRCC.F CMB IECD DO / BD DECE DGRC F.IRCC <IRCC.CMBIECDDO-BDDECEDEGRC.IRCC@cic.gc.ca>; IRCC.F CMB Litigation Mgmt DO / BD Gest Litiges DGRC F.IRCC <IRCC.CMBLitigationMgmtDO-BDGestLitigesDGRC.IRCC@cic.gc.ca>; Dunn.Amy <Amy.Dunn@cic.gc.ca>; Wakeman.Scott <Scott.Wakeman@cic.gc.ca>; Haymes.Michael <Michael.Haymes@cic.gc.ca>; Rushton.Robin-Leah <Robin-Leah.Rushton@cic.gc.ca>; Parkinson.Joshua <Joshua.Parkinson@cic.gc.ca>; Savage.Renaud <Renaud.Savage@cic.gc.ca>; Heap.Susie <Susie.Heap@cic.gc.ca>; Wallace.Gary <Gary.Wallace@cic.gc.ca>; Mullen.Colleen <Colleen.Mullen@cic.gc.ca>; Matheson.Brianne <Brianne.Matheson@cic.gc.ca>; Kinoshita.Andrew <Andrew.Kinoshita@cic.gc.ca>; Turinov.Anna <Anna.Turinov@cic.gc.ca>; Richer.Benoit <Benoit.Richer@cic.gc.ca>; Blakely.Gregg <Gregg.Blakely@cic.gc.ca>; Morgan.Trevor <Trevor.Morgan@cic.gc.ca>; Merineau.Isabelle <Isabelle.Merineau@cic.gc.ca>; Nanavati.Taralee <Taralee.Nanavati@cic.gc.ca>; Cairncross.Emily <Emily.Cairncross@cic.gc.ca>; Avendano.Patricia <Patricia.Avendano@cic.gc.ca>; MacKinnon.Heather <Heather.MacKinnon@cic.gc.ca>; Thomas.Jessica <Jessica.Thomas@cic.gc.ca>; Chao.Kim <Kim.Chao@cic.gc.ca>; Pilon.Colette <Colette.Pilon@cic.gc.ca>; Chan-Kravitz.Anne <Anne.Chan-Kravitz@cic.gc.ca>; Sam-Daliri.Rasa <Rasa.Sam-Daliri@cic.gc.ca>; Bernier.Josh <Josh.Bernier@cic.gc.ca>; IRM TRIMA DO / BDO RTAGIGRI (IRCC) <IRCC.IRMTRIMADO-BDORTAGIGRI.IRCC2@cic.gc.ca>

Subject: (for director approval) Lighthouse Governance Framework - by 27 July

Colleagues,

(For those I have not yet met – this is my first week as the new director for TR Integrity Management within IRM. Looking forward to connecting with you more soon!)

I first wanted to thank you for your teams' continued collaboration and contributions on the Lighthouse Governance Framework, which I understand have been substantial.

Following weekly discussions and two rounds of consultation during which your helpful feedback was incorporated, our working group members have been diligently refining the Governance Framework for your review/input. This framework will of course continue to evolve as the Department adapts to the use of artificial intelligence in our operations. While most of the work to date has been most applicable to the TR line of business, we hope to expand the framework to include other lines of business in due course. We are now **seeking your approval of this final draft by COB Tuesday 27 July**.

Lighthouse Governance Framework – Final Draft for Director Approval

Once we have secured your approval on the framework, we will seek DG approval of the framework from DGs of IRM, OPP, CDO, SPPB, CN, IN, and DN, as key stakeholders. We will then package with a memo which will route to those DGs as well as IPG, CMB, IAAB, Admiss, and DLSU.

Sincere thanks again for your and your teams' continued engagement on this file, and for **your approval (or any red-line comments) by COB Tuesday 27 July** so we can proceed to seek DG approval by early August.

If you are copied on this message but your Director is not included as a recipient, kindly ensure that this message reaches them.

Don't hesitate to contact me or Josh Bernier (currently acting for Anne Chan-Kravitz) should there be any questions or concerns.

Many thanks,

Liz

Elizabeth Stronach

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Elizabeth.Stronach@cic.gc.ca / Cell.:

TELEWORKING // EN TÉLÉTRAVAIL

Haymes.Michael

From: Haymes.Michael
Sent: May 21, 2021 2:48 PM
To: Gonzalez.Steven; Wakeman.Scott
Subject: RE: Business owner for LH pilot

Hi Steven,

Sorry about the delay on this. Some points on why IRM makes a good business owner for lighthouse. The networks are the obvious other choice as they have oversight over the RAO functions.

- Lighthouse is a risk management tool that aligns very closely with IRM's mandate and dovetails closely with their oversight role on related products such as Module 5 of Chinook.
- In addition to having a mandate for the overall coordination of program integrity, IRM is also a key end-user for the system. A2SC has had productive working-level partnerships on the tool with various teams across IRM. Lighthouse has proven effective at supporting them in their mandate to identify and assess broad risk and integrity issues.
- IRM was A2SC's principal partner on the Lighthouse Governance Working Group. Under that initiative, IRM drafted the initial governance and oversight framework for the tool, and undertook a deep dive to review of the system's outputs and design.
- Unlike other A2SC projects which have focussed on program eligibility, Lighthouse is primarily a tool to identify possible admissibility concerns, which more closely aligns with IRM's mandate.

Michael Haymes

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From: Gonzalez.Steven
Sent: May 20, 2021 3:15 PM
To: Haymes.Michael ; Wakeman.Scott
Subject: Business owner for LH pilot

Hi guys,

Blair would like to send an email to Alain Desruisseaux to formally request that IRM be the business owner of LH, or at least this pilot. A few bullets would suffice to explain why IRM is the best fit and the role played by IRM in developing this pilot and the governance WG last winter.

Could you please draft something?

Thanks!

s.16(2)

Steven Gonzalez

s.19(1)

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Steven.Gonzalez@cic.gc.ca / Tél:

Haymes.Michael

From: El-Kass.Wassim
Sent: August 17, 2021 12:18 PM
To: OPP DGO / BDG PRO (IRCC); Haymes.Michael
Subject: RE: For DG approval: F-01190719 Lighthouse governance framework

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: WTATIP - REVIEW

Hello,

Sorry for the delays as the key A2SC players on this are away either on vacation or for medical reasons. I reviewed the memo and related documents and everything looks good to me. Please consider this email as the A2SC approval as I am currently the Acting Director.

Thank you,

Wassim El-Kass

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Wassim.El-Kass@cic.gc.ca / Tél.:

From: OPP DGO / BDG PRO (IRCC)
Sent: August 6, 2021 3:44 PM
To: El-Kass.Wassim ; Haymes.Michael
Cc: OPP DGO / BDG PRO (IRCC)
Subject: FW: For DG approval: F-01190719 Lighthouse governance framework

Hello AWSC,

Please provide comments/approval by **august 16th**.

F-07790719 - Memo to DGs on the Governance and Business Ownership of the Lighthouse tool
<http://gcdocs2.ci.gc.ca/otcs/cs.exe?func=ll&objid=406763205&objAction=browse&sort=name>

The memo is addressed to DG IRM and DG OPPB, as business owners of the tool, but we are seeking other branches' concurrent approval given your teams' significant involvement in the development of the tool and governance framework.

Thank you,

Brittany Doyle (she/her/elle)

a/Executive Assistant, Director General's Office
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Immigration, Refugees and Citizenship Canada / Government of Canada
Brittany.Doyle@cic.gc.ca / Tel: 613-437-6199 (Teleworking)

Adjointe executive, Bureau du directeur général
Planification et rendement des opérations
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Brittany.Doyle@cic.gc.ca / Tél.: 613-437-6199

From: IRM DGO / BDG GRI (IRCC)
Sent: August 6, 2021 3:37 PM
To: IRCC.F OPP DGO / BDG PRO F.IRCC <IRCC.OPPDGO-BDGPRO.IRCC@cic.gc.ca>; IRCC.F CN DGO / BDG RC F.IRCC <IRCC.CNDGO-BDGRN.IRCC@cic.gc.ca>; IRCC.F DN DGO / BDG RN F.IRCC <IRCC.DNDGO-BDGRN.IRCC@cic.gc.ca>; IRCC.F IN DGO / BDG RI F.IRCC <IRCC.INDGO-BDGRI.IRCC@cic.gc.ca>; IRCC.F CDO DGO / BDG DPD F.IRCC <IRCC.CDODGO-BDGDPPD.IRCC@cic.gc.ca>; IRCC.F SPPB DGO / BDG DGPSP F.IRCC <IRCC.SPPBDGO-BDGDGPSP.IRCC@cic.gc.ca>
Subject: For DG approval: F-01190719 Lighthouse governance framework

Good afternoon,

This is to seek DG approval on the below docket

F-07790719 - Memo to DGs on the Governance and Business Ownership of the Lighthouse tool
<http://gcdocs2.ci.gc.ca/otcs/cs.exe?func=ll&objid=406763205&objAction=browse&sort=name>

The memo is addressed to DG IRM and DG OPPB, as business owners of the tool, but we are seeking other branches' concurrent approval given your teams' significant involvement in the development of the tool and governance framework.

We would be grateful for your review and approval by **August 18**.

Many thanks,

Sarah Tal

A/Senior Advisor to the Director General, Integrity Risk Management (IRM)
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Conseillère principale p.i. au Directeur Général, Gestion des risques pour l'intégrité (GRI)
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Haymes.Michael

From: Haymes.Michael
Sent: May 13, 2021 11:52 AM
To: Gonzalez.Steven; Ryu.Jae-Jin; Wakeman.Scott; Heap.Susie; Ahmad.Imran
Cc: Xu.Michele
Subject: RE: INSC presentation on LH - May 13

This is really great. Glad you were able to present it, Steven. Looping in Michele as well, who did some great work on drafting the deck.

Mike

Michael Haymes

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, Planification et rendement des opérations
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From: Gonzalez.Steven
Sent: May 13, 2021 11:48 AM
To: Ryu.Jae-Jin ; Haymes.Michael ; Wakeman.Scott ; Heap.Susie ; Ahmad.Imran
Subject: INSC presentation on LH - May 13

Hi everyone,

Blair asked me to present the deck. It went super well. A very easy crowd. Below are some comments we received. Apologies for the steno, I was typing in real time.

Pemi (IN):

- Hugely supportive
- Supports going to DESC
- Will support with expertise
- Very interested in endorsement for future phases. Makes sense to go one LoB at a time, but some fundamental building blocks or steps across all LoB could be laid before pilot ends.
- We're trying to gather more intel on what's happening in each country. For example, India has just suspended all graduations due to covid-19; in future years, IN is trying to keep track of such intel

Alain (IRM):

- Very supportive, also of the name change
- IRM has been closely involved. Wants to remain fully committed to LH
- Blair asked him about ownership? Alain was non-committal

Tara (CN)

- Very supportive

- Next steps should include engagement with unions and larger engagement (RAOs are unionized too)

Andre (IPG)

- Fully supportive. We should move forward
- Program owner: if rules are set by the system, functional guidance doesn't need to sign off. But if IPG is providing advice on rules, then he can sign

Blair:

- Maybe also present to Issues Management Committee (IMC)

There was a question about the officer of record. I explained that it doesn't apply. I will add somewhere in the deck that the officer of record isn't necessary.

I will add a note that the TBS Directive doesn't apply.

Thanks everyone!

Haymes.Michael

From: Ryu.Jae-Jin
Sent: September 29, 2021 8:36 AM
To: Gonzalez.Steven; Haymes.Michael; Guan.Na
Subject: RE: LH governance

Categories: WTATIP - REVIEW

Yes, we are asking them to step in to lead the WG and gather feedback to ensure progress. I think this is in line with R&R indicated in the LH framework document (below).

Integrity Risk Management Branch (IRMB) will:

- Lead the management and maintenance of the framework document and its contents to ensure that new changes are approved by the relevant stakeholders and reflected in the document;
- Lead Lighthouse Working Group meetings or ad hoc discussions on pilots or initiatives, as needed;
- Conduct annual reviews of sectoral roles and responsibilities, ensuring that the details of the framework remain in line with departmental directives and guidelines;
- Implement a dedicated channel for processing networks and OPP to provide robust feedback on the use of Lighthouse, to ensure concerns, requests, and updates are well-documented;
- Review and report, upon request, to A²SC and Risk Assessment Units (RAUs) on configurations to ensure that risk patterns mined are suitable and free of bias and discrimination; and,
- Establish QA protocols and conduct program integrity exercises, in collaboration with relevant stakeholders, on the effectiveness of the tool, when required.

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch
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 Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada
Jae-Jin.Ryu@cic.gc.ca / Tél.:

From: Gonzalez.Steven
Sent: Tuesday, September 28, 2021 5:01 PM
To: Ryu.Jae-Jin ; Haymes.Michael ; Guan.Na
Subject: LH governance

FYI,

MJ said we should treat LH different from other models when it comes to governance. We will follow the LH governance framework that DGs approved last summer that was written by IRM.

Merci.

Steven Gonzalez

Acting Director, Advanced Analytics Solutions Centre (A²SC)

s.16(2)

s.19(1)

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Lighthouse (aka Watchtower) Project Updates Global Risk & Fraud Pattern Detection

Presented by Operations Planning and Performance Branch
Integrated Network Steering Committee (INSC) Meeting

May, 2021

Purpose

1. Provide an overview of the A2SC-developed Lighthouse (previously known as Watchtower) Risk Identification System.
2. Outline plans for an operational pilot project, testing the use of the tool to improve program integrity and fraud detection efficiency in the global Student Permit (SP) caseload.

What is Lighthouse (a.k.a. Watchtower)?

Lighthouse is a prototype system that automatically and comprehensively extracts risk and fraud patterns from data, providing timely and actionable information to IRCC.

It DOES NOT recommend or make an administrative decision about a client.

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16(1)(b), 16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

Value Proposition of Lighthouse

Flexible	Built in-house and is readily adaptable to other IRCC business lines
Comprehensive	System can scan for almost all forms of data-detectable risk patterns, and be configured for specific risk types (e.g., misrep, organized crime, etc.) or countries
Proactive	Able to identify new risk patterns, thus enabling Risk Assessment Units (RAUs) to proactively select cases for verifications, based on previous indicators
Effective	Enables RAUs and investigative teams to be more efficient and effective in identifying, validating and taking action on fraud and risk patterns
Improve Processing	Can contribute to improving processing speed of bona-fide applications
Cost savings	Cost avoidance from fewer adverse events (e.g., each asylum claim costs the federal government roughly \$16,000)
Complementary	Dovetails with existing intelligence-based risk detection approaches
Inexpensive	Modest costs for development and maintenance. Immediately deployable using existing infrastructure

EVALUATION, OPERATIONAL PILOTS & NEXT STEPS



**Pages 48 to / à 75
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16(1)(b), 16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

s.16(1)(b)

s.16(1)(c)

Pilot Considerations: System complements human decision making

System provide neutral, factual information to increase evidence available to officers

- Lighthouse only provides information to support RAO decisions about when to collect additional evidence.
- No decision automation.
- All data used by the system originates from GCMS

Key Design Principle:

Lighthouse does not automate decisions, and does not affect processing of legitimate, non-adverse applications

The pilot is designed to avoid fettering

- Lighthouse information is only provided to risk assessment units for their consideration; adjudicating officers will not see Lighthouse pattern information and will not be informed which applications are involved in the pilot.

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SP Pilot Next Steps

- Key steps for launch
 - INSC
 - DESC
 - Possibly IMC
 - Union engagement for CN staff
 - Identify business owner
- Determine necessary steps for full, enterprise-wide deployment



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16(1)(b), 16(1)(c)

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16(1)(b), 16(1)(c)

**of the Access to Information Act
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Annex 3: Participating Teams

Engaged Stakeholders

- International Network (IN)
- Domestic Network (DN)
- Centralized Network (CN)
- Integrity Risk Management (IRM)
- Immigration Program Guidance (IPG)
- Legal Services (Department of Justice/LSU)
- Privacy (ATIP)
- Strategic Planning and Performance (SPP)



Annex 4: Mitigation of Bias/Discrimination

- A2SC goes to great lengths to ensure that Lighthouse is developed responsibly and does not introduce bias.
- Steps include:
 1. External review of Lighthouse by Statistics Canada
 2. Following best practices in data science to avoid bias and active monitoring of risk indicators
 3. Many layers of human review of the risk patterns to eliminate incremental bias
 4. Overall design centred on the interests of the client to avoid causing harm
 5. Active engagement with external stakeholders, including governance exercise in Winter 2020
 6. Follow the comprehensive ethics framework to govern AA work

s.16(2)

s.19(1)

Haymes.Michael

From: Ryu.Jae-Jin
Sent: October 8, 2020 8:28 AM
To: Haymes.Michael
Cc: Gonzalez.Steven; Wakeman.Scott
Subject: RE: Next steps - Watchtower Governance Working Group

Categories: Important, WTATIP - REVIEW

Hi Mike,

I will send out the solicitation message. Please send the draft when ready.

Thanks,

Jae-Jin Ryu, Ph.D.

Acting Director, Advance Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice par intérim, Centre de solutions en analytique avancée (CSA²), Direction de la Planification et rendement des opérations

Immigration, Réfugiés et Citoyenneté Canada

Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.: :

From: Haymes.Michael

Sent: October 7, 2020 12:32 PM

To: Ryu.Jae-Jin

Cc: Gonzalez.Steven ; Wakeman.Scott

Subject: RE: Next steps - Watchtower Governance Working Group

Sounds great, thanks. Mike

From: Ryu.Jae-Jin

Sent: October 7, 2020 12:30 PM

To: Haymes.Michael <Michael.Haymes@cic.gc.ca>

Cc: Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; Wakeman.Scott <Scott.Wakeman@cic.gc.ca>

Subject: RE: Next steps - Watchtower Governance Working Group

Hi Mike,

I would potentially be supportive – let me have a quick chat about this during the management meeting later this PM and get back to you.

Thanks,

Jae-Jin Ryu, Ph.D.

Acting Director, Advance Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch

Immigration, Refugees and Citizenship Canada

Canada School of Public Service Digital Academy Fellow

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Immigration, Réfugiés et Citoyenneté Canada

Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada

Jae-Jin.Ryu@cic.gc.ca / Tél.: :

From: Haymes.Michael

Sent: October 7, 2020 10:46 AM

To: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Cc: Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; Wakeman.Scott <Scott.Wakeman@cic.gc.ca>

Subject: Next steps - Watchtower Governance Working Group

Hi Jae-Jin,

I just wanted to give you a head's up on the progress around the watchtower governance working group.

The focus would be to do an operationally realistic (but non-administrative) run of watchtower and sort of play out how the governance processes around rule approval, front-line use, etc., would proceed, and then use that exercise to hopefully draft a good governance framework that is informed by this realistic scenario. At the same time, we're hoping to use this group to address any of the governance issues that came out of the legal opinion (legal would be invited to participate). The project would run for a few months and hopefully give us a good footing to move forward. To ensure that the project has a bit of visibility from the get-go we were hoping to send a request out at the director level for participants (Ravi Sall, Malcolm Eales, etc.), so we could draft up an invite email for you to send out seeking that participation. We will also have a list of back-pocket people that we think would be good, if they want suggestions. This should be a good way to get a reasonably quick win and visibility on the work, without waiting for the project to conclude.

Immediate next steps:

This week: Share draft charter with you for comments/discussion.

Next week: Further Discussion/Send invite to colleagues seeking participation

Kickoff meeting: late October.

Are you okay with the approach to seeking participants via director suggestion?

Mike

s.16(1)(b)

s.16(1)(c)

s.21(1)(b)

Haymes.Michael

From: Watson.Greg
Sent: July 19, 2021 2:13 PM
To: Haymes.Michael
Cc: Wakeman.Scott; Coppola.Stephen; Savage.Renaud; Thomas.Jessica; Brisebois.Eve; Rogers.Jeff; Zovatto.Giuliana; Kasman.Paul; Buck.Joshua; Cantin.Marco
Subject: RE:
Categories: WTATIP - REVIEW

Michael,
Per our conversation, IN would prefer option 2 as well. The exchange you and I had regarding the importance of user feedback suggests that option 2 is the better tool to that purpose.
As agreed, IMRI will handle the review for IN. I will get back to you with a referral process in the next day or so but assume in the absence of details that you can always go to the RAOs through me.
Thanks
Greg

From: Savage.Renaud
Sent: July 19, 2021 12:00 PM
To: Haymes.Michael ; Thomas.Jessica ; Watson.Greg ; Brisebois.Eve
Cc: Wakeman.Scott ; Coppola.Stephen
Subject: RE: Triage option for the SP Lighthouse pilot

Hi Michael,
We prefer option 2. It worked well during the first iteration of the pilot and should continue to work well for this second one.
We like the extra column that highlights the issue/concern, i.e. LoA, GIC, etc.
Renaud Savage

A/Assistant Director, Risk Assessment Unit,
Domestic Network, Immigration, Refugees and Citizenship Canada
Renaud.Savage@cic.gc.ca / Tel: 613-698-1792

Directeur adjoint (p.i), Unité d'évaluation des risques,
Réseau national, Immigration, Réfugiés et Citoyenneté Canada
Renaud.Savage@cic.gc.ca / Tél.: 613-698-1792

From: Haymes.Michael
Sent: July 16, 2021 12:01 PM
To: Thomas.Jessica ; Savage.Renaud ; Watson.Greg ; Brisebois.Eve
Cc: Wakeman.Scott
Subject: RE: 1

Yep. That works for me. 1

Michael Haymes

A/Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance
Immigration, Refugees and Citizenship Canada / Government of Canada

From: Thomas.Jessica
Sent: July 16, 2021 11:46 AM
To: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Savage.Renaud <Renaud.Savage@cic.gc.ca>; Watson.Greg

s.16(1)(b)

s.16(1)(c)

s.21(1)(b)

<Greg.Watson@cic.gc.ca>; Brisebois.Eve <Eve.Brisebois@cic.gc.ca>

Cc: Wakeman.Scott <Scott.Wakeman@cic.gc.ca>

Subject: RE: Triage option for the SP Lighthouse pilot

From: Haymes.Michael

Sent: Friday, July 16, 2021 11:44 AM

To: Thomas.Jessica <Jessica.Thomas@cic.gc.ca>; Savage.Renaud <Renaud.Savage@cic.gc.ca>; Watson.Greg <Greg.Watson@cic.gc.ca>; Brisebois.Eve <Eve.Brisebois@cic.gc.ca>

Cc: Wakeman.Scott <Scott.Wakeman@cic.gc.ca>

Subject: RE:

Thanks Jessica,

Thoughts?

Mike

Michael Haymes

A/Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance
Immigration, Refugees and Citizenship Canada / Government of Canada

From: Thomas.Jessica

Sent: July 16, 2021 11:32 AM

To: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Savage.Renaud <Renaud.Savage@cic.gc.ca>; Watson.Greg <Greg.Watson@cic.gc.ca>; Brisebois.Eve <Eve.Brisebois@cic.gc.ca>

Cc: Wakeman.Scott <Scott.Wakeman@cic.gc.ca>

Subject: RE:

From: Haymes.Michael

Sent: Thursday, July 15, 2021 4:10 PM

To: Thomas.Jessica <Jessica.Thomas@cic.gc.ca>; Savage.Renaud <Renaud.Savage@cic.gc.ca>; Watson.Greg <Greg.Watson@cic.gc.ca>; Brisebois.Eve <Eve.Brisebois@cic.gc.ca>

Cc: Wakeman.Scott <Scott.Wakeman@cic.gc.ca>

Subject:

Hi everyone,

Thoughts? Comments?

Michael Haymes

, Operations Planning and Performance

Immigration, Refugees and Citizenship Canada / Government of Canada

Michael.Haymes@cic.gc.ca / Tel: 613-437-8909

s.16(1)(b)

s.16(1)(c)

s.21(1)(b)

, Planification et rendement des opérations

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Scott Wakeman

Analyste Senior, Centre de solutions en analytique avancée (CSA²), Planification et rendement des opérations
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Scott.Wakeman@cic.gc.ca / Tél.: 613-437-9824

s.16(2)

s.19(1)

Haymes.Michael

From: Ryu.Jae-Jin
Sent: September 28, 2021 10:24 AM
To: Chan-Kravitz.Anne
Cc: Haymes.Michael; Sam-Daliri.Rasa; Abraham.Rami
Subject: RE: AA Governance - LightHouse

Categories: WTATIP - REVIEW

Sounds good. Generally speaking, what I had in mind for project management are the following;

- Lead WG meetings and gather feedback from stakeholders to ensure project progress.
- Develop required project documentations (e.g., trackers, ToR, risk logs, etc) and briefing materials with support from SMEs.

For your information, below is the proposed role for AA business owners.

The Business Owner is ultimately responsible and accountable for the overall prioritization of AA projects for their program area as well as the delivery of said projects, any project communications and the completion of project deliverables. The business owner will coordinate and facilitate working group meetings, work with SMEs to develop supporting materials, and is responsible for ensuring the appropriate approvals are provided and governance followed.

From A2SC, myself, Mike Haymes and Steven Gonzalez could participate in the discussion.

Thanks for your support.

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch
Immigration, Refugees and Citizenship Canada
Canada School of Public Service Digital Academy Fellow
Jae-Jin.Ryu@cic.gc.ca / Tel: :

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations
Immigration, Réfugiés et Citoyenneté Canada
Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada
Jae-Jin.Ryu@cic.gc.ca / Tél.: :

From: Chan-Kravitz.Anne
Sent: Tuesday, September 28, 2021 9:38 AM
To: Ryu.Jae-Jin
Cc: Haymes.Michael ; Sam-Daliri.Rasa ; Abraham.Rami
Subject: RE: AA Governance - LightHouse

Hi Jae-Jin,

Thanks for reaching out. Glad to hear that the RAO engagement is in full swing. I think we were waiting to hear back from our DGO so picking up the pieces to confirm where IRM lies.

We certainly want to support the work you are doing and have dedicated a couple of resources to make this happen. Can I suggest a call with Directors and Managers/Senior Officers to better understand what you foresee as the "project management aspects" moving forward? Let me know who the players will be at your end and I can initiate the invite.

I honestly have no clue where IPG lies at this point but having them in the discussions can muddle things but want it to be clear where the division is between us (OPP and IRM) before I figure the piece between us and IPG.

Let me know if this works.

Anne Chan-Kravitz

Integrity Risk Management / Gestion des risques pour l'intégrité
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Anne.Chan-Kravitz@cic.gc.ca / Tél.: 613-296-5454

From: Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>
Sent: September 28, 2021 9:25 AM
To: Chan-Kravitz.Anne <Anne.Chan-Kravitz@cic.gc.ca>
Cc: Haymes.Michael <Michael.Haymes@cic.gc.ca>
Subject: AA Governance - LightHouse

Hi Anne,
Hope all is well with you! It's been a while.

You probably have heard – there is a high-level discussion taking place regarding the business ownership of AA models. For Lighthouse and the current SP pilot project, Mike from A2SC has been the lead organizing stakeholder meetings and consolidating feedbacks from RAOs, as well as leading the technical development. Going forward, we are hoping to mainly focus on the technical development and delivery, so it would be great if the project management aspects could be transitioned to IRM (or IPG, if they wish).

Let me know what your thoughts are. Happy to have a chat.

Thanks,

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch
Immigration, Refugees and Citizenship Canada
Canada School of Public Service Digital Academy Fellow
Jae-Jin.Ryu@cic.gc.ca / Tel:

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations
Immigration, Réfugiés et Citoyenneté Canada
Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada
Jae-Jin.Ryu@cic.gc.ca / Tél.

s.16(1)(b)

s.16(1)(c)

s.21(1)(b)

Haymes.Michael

From: Wakeman.Scott
Sent: January 19, 2021 10:26 AM
To: Ryu.Jae-Jin; Gonzalez.Steven; Haymes.Michael
Subject: RE:

From: Ryu.Jae-Jin
Sent: January 19, 2021 9:39 AM
To: Gonzalez.Steven ; Haymes.Michael ; Wakeman.Scott
Subject: RE:

Jae-Jin Ryu, Ph.D.

Assistant Director, Advanced Analytics Solutions Centre (A²SC), Operations Planning and Performance Branch
Immigration, Refugees and Citizenship Canada
Canada School of Public Service Digital Academy Fellow
Jae-Jin.Ryu@cic.gc.ca / Tel: 343-551-2190

Directrice adjointe, Centre de solutions en analytique avancée (CSA²), Direction de la planification et rendement des opérations
Immigration, Réfugiés et Citoyenneté Canada
Enseignante associée de l'Académie du numérique, École de la fonction publique du Canada
Jae-Jin.Ryu@cic.gc.ca / Tél.: 343-551-2190

From: Gonzalez.Steven
Sent: January 18, 2021 11:19 PM
To: Haymes.Michael <Michael.Haymes@cic.gc.ca>; Wakeman.Scott <Scott.Wakeman@cic.gc.ca>; Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>
Subject: RE:

Thanks Mike.

Steven Gonzalez

Acting Director, Advanced Analytics Solutions Centre (A²SC)

Operations Planning and Performance
Immigration, Refugees and Citizenship Canada / Government of Canada
Steven.Gonzalez@cic.gc.ca / Tel:

s.16(2)

s.16(1)(b)

s.16(1)(c)

s.21(1)(b)

Directeur par intérim, Centre de solutions en analytique avancée (CSA²)
Planification et rendement des opérations
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Steven.Gonzalez@cic.gc.ca / Tél:

From: Haymes.Michael

Sent: Monday, January 18, 2021 9:08 PM

To: Wakeman.Scott <Scott.Wakeman@cic.gc.ca>; Gonzalez.Steven <Steven.Gonzalez@cic.gc.ca>; Ryu.Jae-Jin <Jae-Jin.Ryu@cic.gc.ca>

Subject: I

Hi folks,

Sorry about the long tome that follows.

Mike

s.16(1)(b)

Michael Haymes

s.16(1)(c)

s.21(1)(b)

Data Scientist, Advanced Analytics Solutions Centre (A2SC)
Immigration, Refugees and Citizenship Canada / Government of Canada
Michael.Haymes@cic.gc.ca

Scientifique des données, Centre de solutions en analytique avancée (CSA2)
Immigration, Réfugiés et Citoyenneté Canada / Gouvernement du Canada
Michael.Haymes@cic.gc.ca

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Algorithmic Impact Assessment

[Home](#) > [Open Government](#)

Algorithmic Impact Assessment Results

Save

Choose File

No file chosen

Start Again

[Link to GitHub project repository](#)

i Information in the AIA is only stored locally on your computer, and the Government of Canada does not have access to the information you place into the tool. If you wish to keep your work, please save the data locally for future use.

On this page

- [Impact Level](#)
- [Requirements Specific to Impact Level:](#)
- [Mitigation Measures](#)
- [Questions and Answers](#)
 - [Project Details](#)
 - [Impact Questions and Answers](#)
 - [Mitigation Questions and Answers](#)

i Impact Level: 2

Current Score: 35

Raw Impact Score: 35

Mitigation Score: 25

Requirements Specific to Impact Level: 2

Peer Review

At least one of: Qualified expert from a federal, provincial, territorial or municipal government institution
 Qualified members of faculty of a post - secondary institution
 Qualified researchers from a relevant non - governmental organization
 Contracted third - party vendor with a related specialization
 Publishing specifications of the Automated Decision System in a peer - reviewed journal
 A data and automation advisory board specified by Treasury Board Secretariat

Notice

Plain language notice posted on the program or service website.

Human-in-the-loop for decisions

Decisions may be rendered without direct human involvement.

Explanation Requirement

In addition to any applicable legislative requirement, ensuring that a meaningful explanation is provided upon request for any decision that resulted in the denial of a benefit, a service, or other regulatory action.

Testing

A-2021-18628-000090

Before going into production, develop the appropriate processes to ensure that training data is tested for unintended data biases and other factors that may unfairly impact the outcomes. Ensure that data being used by the Automated Decision System is routinely tested to ensure that it is still relevant, accurate, and up-to-date.

Monitoring

Monitor the outcomes of Automated Decision Systems on an ongoing basis to safeguard against unintentional outcomes and to ensure compliance with institutional and program legislation, as well as this Directive.

Training

Documentation on the design and functionality of the system.

Contingency Planning

None

Approval for the system to operate

None

[Link to the Directive on Automated Decision-Making Impact Level Requirements](#)

Mitigation Measures

The following internal stakeholders have been consulted:

A documented process is currently in place to test datasets against biases and other unexpected outcomes.

Accountabilities for the design, development, maintenance, and improvements for the system have been assigned.

The audit trail clearly identifies the authority or delegated authority as identified in legislation.

The system records all the recommendations or decisions made by the system.

All key decision points are identifiable in the audit trail.

All key decisions points are linked to the relevant legislation, policy or procedure.

The system's audit trail indicates all of the decision points made by the system.

The system's audit trail can be used to help generate a notification of the decision (including a statement of reasons or other notifications) where required.

The audit trail identifies which version of the system was used for each decision.

The system's audit trail shows who the authorized decision-makers are.

The system is able to produce reasons for its decision or recommendations when required.

There is a process in place to grant, monitor, and revoke access permission to the system.

There is a mechanism to capture feedback by users of the systems.

There is a recourse process in place for clients that wish to challenge the decision.

The system enables human override of system decisions.

There is a process in place to log instances when overrides were performed.

Questions and Answers

Project Details

Name of Respondent

English Content :

Steven Gonzalez

French Content :

Job Title

English Content :

Assistant Director

French Content :

Department

Citizenship and Immigration (Department of)

Branch

English Content :

OPPB

French Content :

Project Title

English Content :

Watchtower pilot

French Content :

Project Phase

Implementation

Please provide a project description:

English Content :

AIA for administrative pilot of Watchtower on TR lines of business

French Content :

Points: 0



What is motivating your team to introduce automation into this decision-making process?

(Check all that apply)

- Improve overall quality of decisions
- The system is performing tasks that humans could not accomplish in a reasonable period of time
- Use innovative approaches

Please check which of the following capabilities apply to your system.

- Text and speech analysis: Analyzing large data sets to recognize, process, and tag text, speech, voice, and make recommendations based on the tagging
- Risk assessment: Analyzing very large data sets to identify patterns and recommend courses of action and in some cases trigger specific actions
- Content generation: Analyzing large data sets to categorize, process, triage, personalize, and serve specific content for specific contexts

Impact Questions and Answers

Is the project within an area of intense public scrutiny (e.g. because of privacy concerns) and/or frequent litigation? **Points: +3**

Yes

Are clients in this line of business particularly vulnerable? **Points: +0**

No

Are stakes of the decisions very high? **Points: +0**

No

Will this project have major impacts on staff, either in terms of their numbers or their roles? **Points: +0**

No

Will you require new policy authority for this project? **Points: +0**

No

The algorithm used will be a (trade) secret **Points: +0**

No

The algorithmic process will be difficult to interpret or to explain **Points: +0**

No

Does the decision pertain to any of the categories below (check all that apply):

- Economic interests (grants and contributions, tax benefits, debt collection) **Points: +1**
- Access and mobility (security clearances, border crossings) **Points: +1**

Will the system only be used to assist a decision-maker? **Points: +1**

Yes

Will the system be replacing a decision that would otherwise be made by a human? **Points: +0**

No

Will the system be replacing human decisions that require judgement or discretion? **Points: +0**

No

Is the system used by a different part of the organization than the ones who developed it?

Points: +4

Yes

Are the impacts resulting from the decision reversible?

Points: +2

Likely reversible

How long will impacts from the decision last?

Points: +2

Some impacts may last a matter of months, but some lingering impacts may last longer

Please describe why the impacts resulting from the decision are as per selected option above.

English Content :

Impacts are highest for SP and WP, where a client could miss a semester or a worker could miss a job opportunity. Impacts for TRV are lower. TRV far outnumber SP and WP combined.

French Content :

The impacts that the decision will have on the rights or freedoms of individuals will likely be:

Points: +1

Little to no impact

Please describe why the impacts resulting from the decision are (as per selected option above).

English Content :

Foreign nationals do not possess a "right" to enter Canada. Impacts are better framed in terms of economic interests (see below) rather than "rights or freedoms."

French Content :

The impacts that the decision will have on the health and well-being of individuals will likely be:

Points: +1

Little to no impact

Please describe why the impacts resulting from the decision are (as per selected option above)

English Content :

TR lines of business are generally not related to health of clients. It is rare that a client is seeking medical attention in Canada.

French Content :

The impacts that the decision will have on the economic interests of individuals will likely be:

Points: +2

Moderate impact

Please describe why the impacts resulting from the decision are (as per selected option above)

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English Content :

Missing a semester or a job opportunity could affect the financial situation of the client. But these cases are fewer in number than TRVs, where the impact on economic interests of the client is generally low.

French Content :

The impacts that the decision will have on the ongoing sustainability of an environmental ecosystem, will likely be: **Points: +1**

Little to no impact

Please describe why the impacts resulting from the decision are (as per selected option above)

English Content :

Not related to the environment

French Content :

Will the Automated Decision System use personal information as input data? **Points: +4**

Yes

What is the highest security classification of the input data used by the system? (Select one) **Points: +3**

Protected B / Protected C

Who controls the data? **Points: +1**

Federal government

Will the system use data from multiple different sources? **Points: +0**

No

Will the system require input data from an Internet- or telephony-connected device? (e.g. Internet of Things, sensor) **Points: +0**

No

Will the system interface with other IT systems? **Points: +4**

Yes

Who collected the data used for training the system? **Points: +1**

Your institution

Who collected the input data used by the system? **Points: +1**

Your institution

Will the system require the analysis of unstructured data to render a recommendation or a decision? **Points: 0**

Yes

What types of unstructured data? (Check all that apply)

- Audio and text files **Points: +2**

Mitigation Questions and Answers

Internal Stakeholders (Strategic policy and planning, Data Governance, Program Policy, etc.) **Points: +1**

A-2021-18628-000095

Yes

External Stakeholders (Civil Society, Academia, Industry, etc.)**Points: +0**

No

Do you have documented processes in place to test datasets against biases and other unexpected outcomes? This could include experience in applying frameworks, methods, guidelines or other assessment tools.

Points: +2

Yes

Is this information publicly available?**Points: +0**

No

Have you developed a process to document how data quality issues were resolved during the design process?

Points: +0

No

Is this information publicly available?**Points: +0**

No

Have you undertaken a Gender Based Analysis Plus of the data?**Points: +0**

No

Is this information publicly available?**Points: +0**

No

Have you assigned accountability in your institution for the design, development, maintenance, and improvement of the system?

Points: +2

Yes

Do you have a documented process to manage the risk that outdated or unreliable data is used to make an automated decision?

Points: +0

No

Is this information publicly available?**Points: +0**

No

Is the data used for this system posted on the Open Government Portal?**Points: +0**

No

Does the audit trail identify the authority or delegated authority identified in legislation?

Points: +1

Yes

Does the system provide an audit trail that records all the recommendations or decisions made by the system?

Points: +2

Yes

Are all key decision points identifiable in audit trail?**Points: +2**

Yes

Are all key decision points within the automated system's logic linked to the relevant legislation, policy or procedures?

Points: +1

Yes

Do you maintain a current and up to date log detailing all of the changes made to the model and the system?

Points: +0

No

Does the system's audit trail indicate all of decision points made by the system?

Points: +1

Yes

Can the audit trail generated by the system be used to help generate a notification of the decision (including a statement of reasons or other notifications) where required?

Yes

Points: +1

Does the audit trail identify precisely which version of the system was used for each decision it supports?

Yes

Points: +2

Does the audit trail show who an authorized decision-maker is?

Yes

Points: +1

Is the system able to produce reasons for its decisions or recommendations when required?

Yes

Points: +2

Is there a process in place to grant, monitor, and revoke access permission to the system?

Yes

Points: +1

Is there a mechanism to capture feedback by users of the system?

Yes

Points: +1

Is there a recourse process established for clients that wish to challenge the decision?

Yes

Points: +2

Does the system enable human override of system decisions?

Yes

Points: +2

Is there a process in place to log the instances when overrides were performed?

Yes

Points: +1

Does the system's audit trail include change control processes to record modifications to the system's operation or performance?

No

Points: +0

Have you prepared a concept case to the Government of Canada Enterprise Architecture Review Board?

No

Points: +0

Have you completed a Privacy Impact Assessment or revised an existing one?

No

Points: +0

Does your system reflect Privacy by Design principles?

No

Points: +0

Export

Export English Document

Export French Document

► English Content

► French Content

Date modified: 2020-06-03

A-2021-18628-000097

Version: 0.8.1



Immigration, Refugees
and Citizenship Canada

Immigration, Réfugiés
et Citoyenneté Canada

Director General
Integrity Risk
Management

Directeur général
Orientation sur les
risques pour l'intégrité

Ottawa K1A 1L1

F- 07790719

PROTECTED B

**MEMORANDUM TO THE DIRECTOR GENERAL, OPERATIONAL PLANNING AND
PERFORMANCE BRANCH AND THE DIRECTOR GENERAL, INTEGRITY RISK
MANAGEMENT BRANCH**

GOVERNANCE AND BUSINESS OWNERSHIP OF LIGHTHOUSE TOOL
FOR APPROVAL

SUMMARY

- This memorandum seeks your approval of the Lighthouse Governance Framework ('the Framework') to ensure agreement on shared ownership and responsibility.
- The Framework provides oversight on the management of the Lighthouse tool and outlines accountabilities, roles, and responsibilities for its development, implementation and use. Business ownership of Lighthouse will be shared between the Operational Planning and Performance Branch (OPPB) and Integrity Risk Management Branch (IRM).
- Lighthouse is an AI-based risk indicator solution that has been developed to automatically and comprehensively extract risk and fraud patterns from source data from the Global Case Management System for any applicable line of business. The tool does not involve automated decision-making.
- We recommend that you approve the Lighthouse Governance Framework and its business co-ownership by signing the approval page within the Framework as well signing this memorandum by August 18, 2021.

BACKGROUND:

- In recent years, the demand for artificial intelligence (AI) solutions to assist with the Department's program delivery has been steadily increasing, primarily to address challenges in volume management. In April 2020, the Treasury Board Secretariat's *Directive on Automated Decision-Making* came into force to outline high-level requirements for automated solutions in the Government of Canada. In June 2019, IRCC also developed its own internal *Policy Playbook* on Automated Support for Decision-Making.

Canada

A-2021-18628-000099

- Formerly known as Watchtower, Lighthouse is an AI-based risk indicator solution that has been developed to automatically and comprehensively extract risk and fraud patterns from source data from the Global Case Management System for any applicable line of business. It is a data-mining tool that identifies and presents fact-based information. The tool's findings can be configured to produce customized reports to satisfy various needs for Risk Assessment Units within the integrated processing network, allowing them to direct their resources to potential cases of concern. This will assist Risk Assessment Units with investigations and large-scale trend analysis, and lead to efficiencies in the identification and processing of higher-risk cases.
- Lighthouse does not make recommendations or render administrative decisions about clients or their applications. Since all eligibility and admissibility decisions will be made by decision makers and the tool would not be involved in making any decisions, an Officer of Record would not be required to act as the authority under the Instrument of Designation and Delegation. Measures have been taken to ensure that human intervention is part of every stage of the tool's application.
- In its initial pilot, which ran in summer 2020 on the caseload of global study permit applications, Lighthouse uncovered over 800 unique risk patterns, some of which led to identification of larger-scale fraud trends. By using the tool's full potential and focusing our risk management efforts where attention is needed most, the Operations Sector can potentially create processing efficiencies in cohorts that do not require as much effort.
- A governance framework (in annex) has been drafted to set priorities for Lighthouse's use, explain its processes, outline related roles and responsibilities, and ensure transparency in the usage of the tool.

CURRENT STATUS:

- Each usage of the tool that involves live applications requires a dedicated project charter to complement the Framework by addressing the specifics of the usage in question. By having a broader framework, the general principles of the tool on its usage and governance can be agreed upon in advance which, when supplemented by specific project charters, would facilitate procedures and expedite implementations.
- Business ownership of Lighthouse will be shared between OPPB and IRM, given each branch's mandate and the potentially broad scope of the Lighthouse project. The responsibility of development, implementation and maintenance of the tool will lie with the Advanced Analytics Solutions Centre team within OPPB. The team will focus on the tool's technical design and record-keeping as it relates to the design and configuration data of the tool, ensuring that the privacy and legal requirements and recommendations are followed. IRM will be responsible for operationalizing the program-level aspects of the tool's findings as well as maintaining administrative aspects of the tool, such as quality management and ensuring the governance framework remains evergreen. IRM will also lead working group meetings to bring forward any necessary changes, in order to respond to departmental priorities or changing risk management practices and develop a consistent approach for the department.

- CDO will play a key role in overseeing the tool's data management. CDO will seek approval on data inputs specific to each implementation or pilot from the Data Executive Steering Committee (DESC), who will in turn inform Issues Management Committee (IMC).
- The processing networks (IN, CN, and DN) and their Risk Assessment Units will operationalize case specific aspects of the tool's findings, and work with IRM and OPPB to map out operational processes and to improve its effectiveness and usage. Case Management Branch will assess larger-scale fraud trends flagged by the tool and ensure resulting business intelligence is shared with all other stakeholders.
- Strategic and Program Policy Branch will be responsible for providing guidance on policies, including Algorithmic Impact Assessments, and for coordinating engagement with other stakeholders and the public.
- Stakeholders such as Migration Health Branch, Citizenship and Passport Programs Branch, and Transformation and Digital Solution Sector (TDSS) may participate in Lighthouse working groups in the future, should the tool's involvement become relevant to their respective mandates.
- This division of roles reflects the approach presented to the Issues Management Committee in December 2018, and aligns with the 2018-2023 Operations Sector Strategic Plan.

CONSULTATIONS:

- The Framework has been developed in close collaboration with key partners. Approval was obtained at the Director level from Operations Planning and Performance Branch, Integrity Risk Management Branch, Centralized Network, International Network, Domestic Network, Immigration Program Guidance Branch, ATIP Division, Legal Services Unit, Strategic Policy and Planning Branch, Case Management Branch, Admissibility Branch, Internal Audit and Accountability Branch, and Chief Data Officer.

RECOMMENDATION(S):

- We recommend that you approve the Framework and its business co-ownership by signing the approval page within the Framework document as well as in this memorandum.

NEXT STEP(S):

- Following your approval, the Framework will be applied to the operational environment starting in fall 2021.
- The second global study permit pilot, which was initially scheduled to run from March to September 2021, is currently in its early consultation phase. Representatives from IRM, OPPB,

- 4 -

PROTECTED B

CN, DN, and IN are meeting weekly, reviewing patterns mined by the tool, and agreeing on procedures.

e-approved

Elizabeth Stronach
Director, Integrity Risk Management Branch

e-approved

Steven Gonzalez
Director, Operational Planning and Performance Branch

DG Signature

Alain Desruisseaux
Director General, Integrity Risk Management Branch

☐ I concur

☐ I do not concur

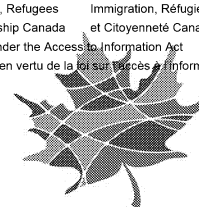
DG Signature

Marie-Josée Dorion
Director General, Operational Planning and Performance Branch

☐ I concur

☐ I do not concur



Annex: Governance Framework for Lighthouse



s.14(a)
 s.16(1)(b)
 s.16(1)(c)

Integrated Networks Steering Committee

Record of Decision
 May 13, 2021

Record of Discussion	Presenter(s)
Chair Opening Remarks/Approval of Record of Discussion	OPP/IN
Please send comments by Friday COB or the RoD will be considered approved.	
Admissions Preparation	OPP
Business Resumption – NIL	
Integrated Network-	
Lighthouse SP Pilot	OPP
<p>Objectif: To seek committee endorsement to begin the pilot to test the use of the tool in improving program integrity and fraud detection efficiency in the global SP caseload. OPP is also seeking a decision regarding the ownership of the program</p> <p>Documents:</p> <div>  Watchtower Integrated Network SI  LH_INSC_QnATalking Points.docx </div> <p>Roundtable:</p> <ul style="list-style-type: none"> IN confirmed their support for this pilot and moving forward to the Data Steering Committee. IN would like to have lighthouse brought back to INSC for endorsement of future phases. IN is interested in assisting OPP's Advanced Analytics team in moving toward more consistent reporting on trends, ground intelligence and external information to identify risks for this tool IRM offered support for this pilot CN gave support for this pilot and IN's proposal to include external data where possible. CN requesting to add building a communications plan and meeting with the bargaining agents to the next steps IPG is fully supportive of the pilot and tool. They too support IN's suggestion to build upon the tool in order to strengthen program integrity. OPP supports the idea of incorporating external factors/trends in order to rely less upon self-declared information In terms of ownership, OPP notes that an Officer of Record Memo would not be required for this scenario <u>given the tool does not make decisions, but</u> we need someone to greenlight the pilot. <p>Decision: The table endorses moving forward with the lighthouse SP Pilot</p> <p>Next steps:</p> <ul style="list-style-type: none"> OPP to bring this item forward to the Data Executive Steering Committee scheduled for late May To determine the business owner and ensure clear accountabilities OPP to brief management teams and bargaining agents 	

Final Round Table

IPG:

- IPG to schedule a meeting with network DGs to ensure clear and consistent approach to processing TR and PR for India/Pakistan

OPP Update on CEC Rounds:

- There continue to be concerns around CRS scores; therefore, a smaller round will be conducted this week than originally planned. Instead of the 6,000 round we will be doing roughly 4200. This will be reviewed on a weekly basis until our inventory with CRS scores over 400 replenishes
- To note this could mean the next 12 rounds could be lower than anticipated making it more difficult to reach targets
- This discussion will be brought to the next LPPC

Members	Branch	In Attendance	Replacement
CO-Chairs			
Blair Haddock	OPPB	Yes	
Pemi Gill	IN	Yes	
Attendance			
Isabelle Daoust	CMB	Yes	
Andre Baril	IPG	Yes	
Sylvain Beauchamp	CEB	No	Cynthia Rebaza
Peter Mielke	OPPB - DART	Yes	
Alain Desruisseaux	IRM	Yes	
Craig Shankar	MHB	Yes	
Tara Davidson	CN	Yes	
Alexandra Hiles	DN	Yes	
Maxine Ifill	CPP	Yes	
Sean McNair	IDI	Yes	
Jean-Marc Gionet	RASO	Yes	
Brittany Doyle	Secretariat	Yes	

Observers	Branch
Christopher Kerr	ST
Julia Gurr-Lacasse	IN
Martin Barry	IPG
Kevin Terry	IN
Malcolm Eales	IPG
Melanie Mercier	IPG
Elizabeth Snow	IN
RoseAnne Poirier	CN
Marie-Josée Dorion	CPP
Steven Gonzalez	OPPB

Ellie Weber	CN
Philippe Desrochers	CMB
Marie-Josée Dorion	ST
Tanya Knight	IRM
Ania Delisle	OPPB
Benjamin Bigio	IPG

Lighthouse Risk Identification System

June 2021



What is Lighthouse (a.k.a. Watchtower)?

Lighthouse is a prototype system that automatically and comprehensively extracts risk and fraud patterns from data, providing timely and actionable information to IRCC.

It DOES NOT recommend or make an administrative decision about a client.

**Pages 108 to / à 150
are withheld pursuant to sections
sont retenues en vertu des articles**

16(1)(b), 16(1)(c)

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Value Proposition of Lighthouse

Flexible	Built in-house and is readily adaptable to other IRCC business lines
Comprehensive	System can scan for almost all forms of data-detectable risk patterns, and be configured for specific risk types (e.g., misrep, organized crime, etc.) or countries
Proactive	Able to identify new risk patterns, thus enabling Risk Assessment Units (RAUs) to proactively select cases for verifications, based on previous indicators
Effective	Enables RAUs and investigative teams to be more efficient and effective in identifying, validating and taking action on fraud and risk patterns
Improve Processing	Can contribute to improving processing speed of bona-fide applications
Cost savings	Cost avoidance from fewer adverse events (e.g., each asylum claim costs the federal government roughly \$16,000)
Complementary	Dovetails with existing intelligence-based risk detection approaches
Inexpensive	Modest costs for development and maintenance. Immediately deployable using existing infrastructure

PILOT (GLOBAL SP)



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s.16(1)(b)

s.16(1)(c)

Pilot Considerations: System complements human decision making

System provide neutral, factual information to increase evidence available to officers

- Lighthouse only provides information to support RAO decisions about when to collect additional evidence.
- No decision automation.
- All data used by the system originates from GCMS

Key Design Principle:

Lighthouse does not automate decisions, and does not affect processing of legitimate, non-adverse applications

The pilot is designed to avoid fettering

- Lighthouse information is only provided to risk assessment units for their consideration; adjudicating officers will not see Lighthouse pattern information and will not be informed which applications are involved in the pilot.

DEMO



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Lighthouse Live Pattern/Match Review Session

September 1, 2021 (CN/DN)

Sept 3, 2021 (IN)

Agenda

Housekeeping & Updates

- Questions from Intro Meeting?
- ADM Presentation
- Target Launch Date for soft launch start: Week of Sept 13, 2021
- User Manual Developed
(<https://gcdocs2.ci.gc.ca/otcs/cs.exe/link/414438888>)
- Project Team Plans for interaction (IN, CN/DN, Project Steering)
- Planning: Charter Updates, Assessment Framework

Part 1: Review of the Lighthouse Weekly Report

(<https://gcdocs2.ci.gc.ca/otcs/cs.exe/link/416335630>)

- Column explanations
- Pattern Report Details
- Group inspection of a few matches

Part 2: Group Preparedness Discussion

Key Questions

Comfort Level - Tool Usage

- How comfortable is the team with usage of the tool?

Comfort Level - Pilot Design

- How comfortable are users with the process as proposed and the start date of Week of Sept. 13, 2021?

Resource Availability

- Is it anticipated that resources will be available to support throughout the pilot?
- Do users need additional support to justify and brief upward on the project or their participation?

Preparedness

- Are there any additional considerations relating to planning, documentation, consultation, process definition, etc., which should be covered pre-launch? (e.g., assessment criteria)

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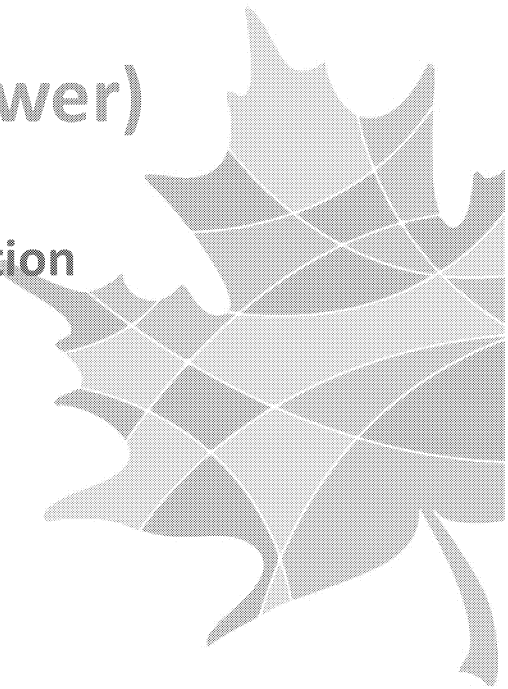
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Lighthouse (aka Watchtower) Project Updates Global Risk & Fraud Pattern Detection

Advanced Analytics Solutions Centre (A²SC-OPPB)

July 2021



Purpose

1. Provide an overview of the A2SC-developed Lighthouse (previously known as Watchtower) Risk Identification System.
2. Outline plans for an operational pilot project, testing the use of the tool to improve program integrity and fraud detection efficiency in the global Student Permit (SP) caseload.

What is Lighthouse (a.k.a. Watchtower)?

Lighthouse is a prototype system that automatically and comprehensively extracts risk and fraud patterns from data, providing timely and actionable information to IRCC.

It DOES NOT recommend or make an administrative decision about a client.

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DEMO



PILOTS



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KEY CONSIDERATIONS



s.16(1)(b)

s.16(1)(c)

Pilot Considerations: System complements human decision making

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- Lighthouse only provides information to support RAO decisions about when to collect additional evidence.
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- All data used by the system originates from GCMS

Key Design Principle:

Lighthouse does not automate decisions, and does not affect processing of legitimate, non-adverse applications

The pilot is designed to avoid fettering

- Lighthouse information is only provided to risk assessment units for their consideration; adjudicating officers will not see Lighthouse pattern information and will not be informed which applications are involved in the pilot.

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THANK YOU!

QUESTIONS?



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Annex: Participating Teams

Engaged Stakeholders

International Network (IN)

Domestic Network (DN)

Centralized Network (CN)

Integrity Risk Management (IRM)

Immigration Program Guidance (IPG)

Legal Services (Department of Justice/LSU)

Privacy (ATIP)

Strategic Planning and Performance (SPP)



Annex: Mitigation of Bias/Discrimination

- A2SC goes to great lengths to ensure that Lighthouse is developed responsibly and does not introduce bias.
- Steps include:
 1. External review of Lighthouse by Statistics Canada
 2. Following best practices in data science to avoid bias and active monitoring of risk indicators
 3. Many layers of human review of the risk patterns to eliminate incremental bias
 4. Overall design centred on the interests of the client to avoid causing harm
 5. Active engagement with external stakeholders, including governance exercise in Winter 2020
 6. Follow the comprehensive ethics framework to govern AA work

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Background

In Canada, privacy is considered a human right. As the majority of the data we handle at IRCC is personal information, privacy requirements must be top-of-mind when planning, developing and monitoring any initiative involving data-driven technology.

This document is intended to outline the privacy protections in place for this particular model or tool. The requirement statements in this document are based off the [Baseline Privacy Requirements for Disruptive Technology](#) that lays out the minimum privacy requirements that must be met for all initiatives involving disruptive technology.

This document **does not replace** the need for a Privacy Impact Assessment (PIA) as it is intended only to analyze privacy compliance at a model level and document steps taken to increase privacy protections. This document may be used to assist in completing a larger initiative or program-level privacy assessment as required. Program areas are responsible for filling out a Privacy Needs Assessment (PNA) and sending it to the [ATIP Division](#). Information about the PNA and the template can be found on [Connexion](#).

Details

Name of Initiative:	
Branch/Division who is responsible for the Model:	
Type of Model (triage, predictive, risk pattern identification, etc):	
Date model is expected to be launched:	
Version 1.0 Model Privacy Assessment is completed:	
Update MPA whenever the Model or Tool is updated	

Model Privacy Assessment

Lighthouse – Study Permit Pilot #2

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Model or Tool Update	
Date:	
Version 2.0 Model Privacy	
Assessment completed:	

Summary of Initiative

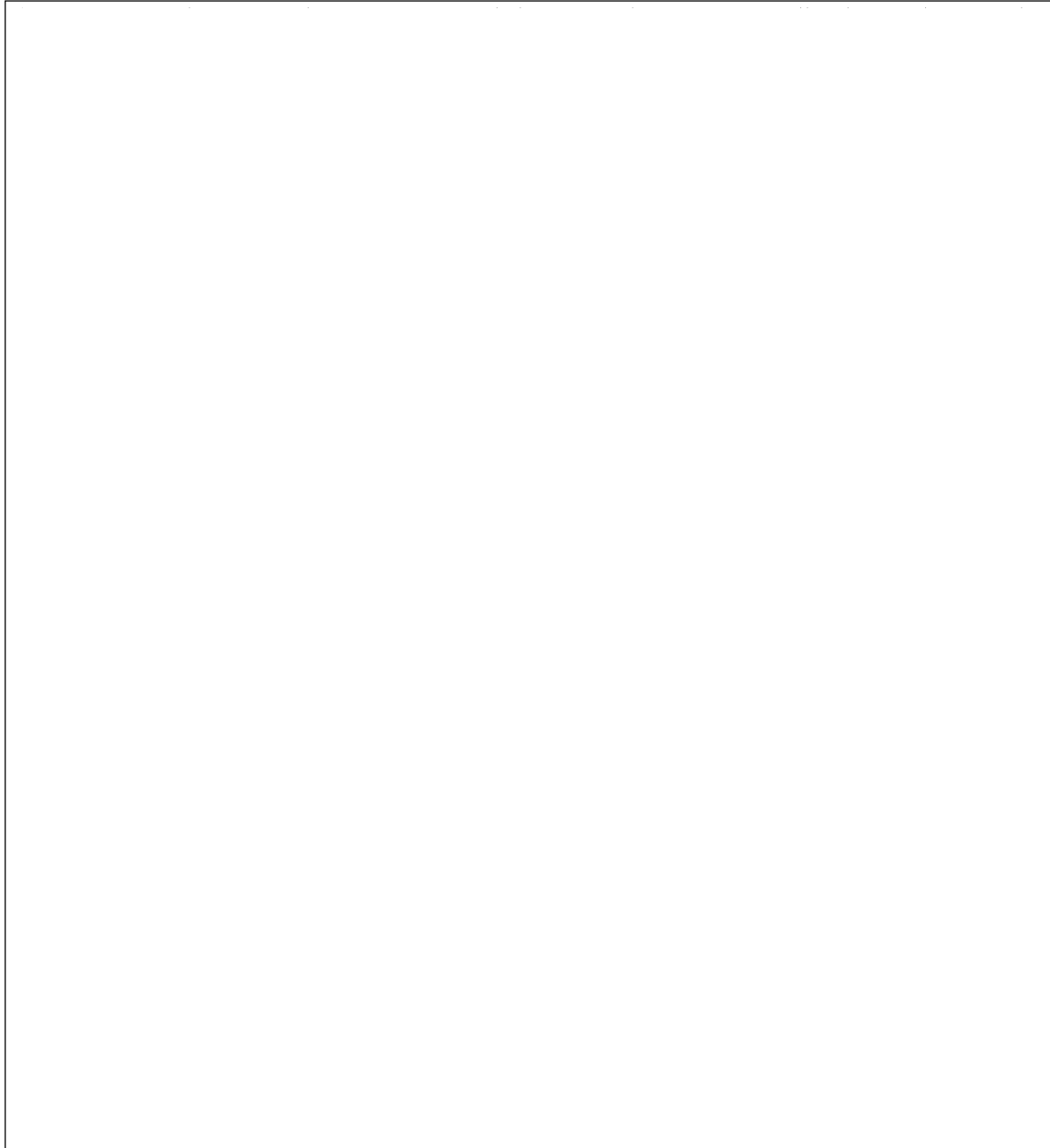
What is the problem this model is trying to solve? Why is this the best solution to that problem? Why is the use of personal information necessary? What does the model do? What is the population the model is being applied to (ex: study permit applicants from a specific country)? In what way does the model support officers in making decisions? Does it suggest decisions for officers? Please include any and all useful information.

Summary of Initiative
<p>Lighthouse is a prototype risk detection tool developed by IRCC's Advanced Analytics Solution Centre (A2SC). The tool aims to enhance program integrity and Canadian public safety by automatically identifying and summarizing historical risk patterns for IRCC officials. The tool aims to provide neutral, fact-based risk information to IRCC officials, augmenting their capacity to quickly identify and understand organized fraud trends and other risk patterns. It can be used to support frontline decision makers or to understand historical risk patterns. Lighthouse presents opportunities for the department to modernize IRCC's risk assessment activities by placing timely and relevant risk information at the fingertips of IRCC officials in a manner that was previously impossible or prohibitively expensive to do.</p>

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High-Level Summary of How the Model Works (as appropriate, include: how the rules are created, how an application runs through a model/how personal information is used in production, an overview of the output/what officers see, etc.)

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Requirements

Legal Authority

A program must have the parliamentary authority to collect and use personal information for the specified purposes of the program. This legal authority will be identified in the Privacy Needs Assessment and other required privacy assessments for this initiative.

A program must also be legally allowed to use disruptive technology and/or automation to support the program. Identify which of the legal authorities below grant your program area the **authority to administer your program(s) using electronic means** (disruptive technology):

☒ Part 4.1 of the Immigration Refugees Protection Act

☐ Section 2.2 of the Passport Order

Accountability

A part of ethical and responsible development and deployment of advanced analytics, artificial intelligence and automation initiatives is ensuring that **humans are ultimately responsible for the model's behaviour**. Describe below the processes to guarantee that

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model rules are reviewed by humans and to make sure that internal governance and accountability (sign-off) processes are in place.

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Source of Data

Personal information must only be collected if it relates directly to an operating program or activity of IRCC and each personal information data element must be necessary to the administration of the program. When possible, personal information should be collected directly from the individual.

For the purposes of disruptive technology initiatives, **only information found in departmental systems of record (ex. GCMS) should be used** unless another data source has been approved by IT Security, and the activities of training models and algorithms should be done outside of those systems of record. Data collected from outside sources should not be used unless demonstrably necessary, and proper information sharing

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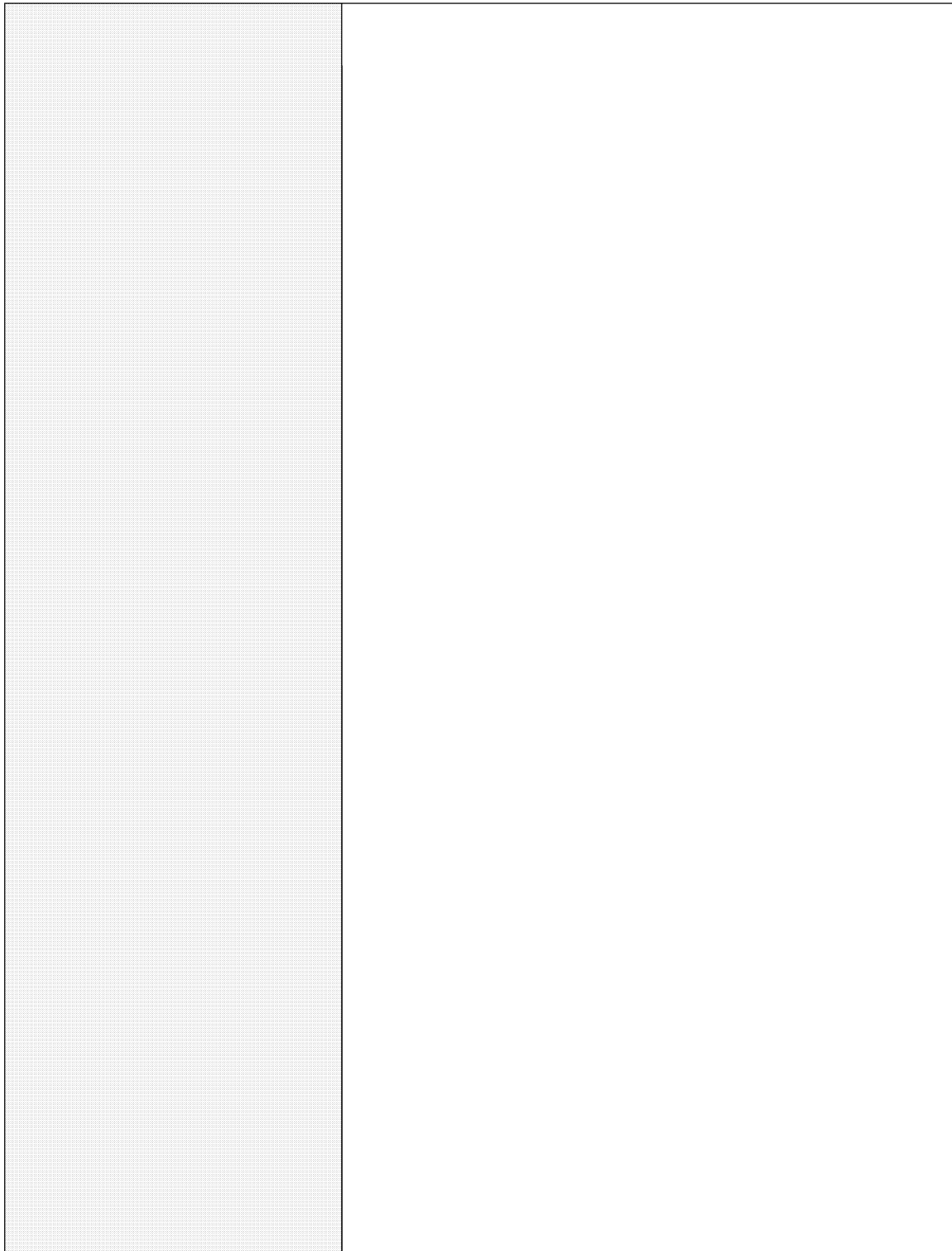
agreements, memoranda of understanding, service level agreements etc. should be in place and followed.

Source of Data – Where the data comes from and reasonableness of using that data	
Source of the data (ex: GCMS)	
If outside data is used, through what means is it collected (ex: MOUs, ISAs, etc.)	
Demonstrate how Necessity, Proportionality, Effectiveness, and Minimal Intrusiveness, were considered and applied in considering what data to use in the model (Oakes Test).	

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Notice / Informed of Purpose / Transparency / Explainability

IRCC must notify individuals (clients and the general public) of the purpose for which their information is being collected, commonly referred to as a ‘privacy notice.’ This notice must be given at or before the time of collection. IRCC must notify past applicants that their information was used to train or build models. Individuals have a right to know exactly how their personal information was processed through a disruptive technology system. Ensuring that plain language explanations are available on demand would allow individuals to see how technology was used to support decision-making.

Notice & Transparency – How individuals (clients and the general public) will be notified about the use of this model and how the use of disruptive technology will be explained to applicants.	
Notice at time of collection (link to the privacy notice if applicable)	The privacy notice on the Study Permit forms as well as the corresponding Personal Information Bank (PIB) have been updated to account for the use of analytics.
Transparency to historical applicants and public	The Digital Transparency webpage that is now published accounts for the use of risk screening tools such as Lighthouse by explaining that advanced data analytics systems will be used by IRCC to recognize patterns to help accelerate our work and better inform decision makers.

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<p>Explainability of the model (link to the plain language explanation)</p>	<p>The pattern reports that are used in Lighthouse are intended to provide sufficient evidence of any individual pattern. All patterns are “self-contained” in that they are intended to stand on their own merit regardless of the rest of the system. Encrypted data and model information is currently being retained to allow A2SC to recreate a model on-demand and provide the underlying data to explain how Lighthouse patterns were produced and why applications matched against these patterns.</p>
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Accuracy

IRCC must take all reasonable steps to ensure that personal information used for an administrative purpose is as **accurate, up-to-date and complete as possible**. This also includes ensuring there are mechanisms to correct inaccurate information.

For initiatives involving disruptive technology, this involves ensuring data is collected from a reliable source, the quality of the data, developing technological mechanisms to make certain that the technology is working (such as feedback loops and blind tests), quality assurance on the outputs, and so on. Additionally, to guarantee the accuracy of the data, program areas must take the necessary steps to minimize unintended bias in the data. Finally, accuracy also involves model maintenance and ensuring the model is trained and re-trained on the most updated, accurate and reliable data.

Accuracy – Ways the model is ensuring accuracy of the data and outputs, and the process to correct inaccuracies. Describe any Quality Assurance (QA) processes that are in place.

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Use

Personal information must only be used for the purpose it was initially collected, a use consistent with that purpose or for a purpose for which it is may be disclosed under section 8(2) (see Disclosure, below).

Applying disruptive technology to a dataset involving personal information is a use; this includes all uses whether administrative or not. Personal information must be treated appropriately regardless of the level of automation or support the technology is providing. The use of disruptive technology should be a consistent use of the personal information. To determine what constitutes a consistent use of personal information, the original purpose and the proposed purpose must be so closely related that the individual would expect that the information would be used for the consistent purpose, even if the use is not spelled out.

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Use – Mechanisms that are in place to reduce the inappropriate use of the data	
Confirmed that applying this model is a consistent use of the personal information (provide the text from the legal opinion if applicable at time of completing this assessment)	
Data minimization (only use data elements that are absolutely necessary)	
Reducing data granularity (removing precision of some data elements, ex: using only the first three digits of a postal code)	
De-identification (masking/hashing/synthesizing)	

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data so that it's no longer personally identifiable)	
Need to Know (ensuring access is only granted to those who need to know it)	
Other (Ex: Use of privacy enhancing technologies, anonymizing data for all demonstrations, etc)	

Disclosure

Personal information under IRCC's control must not be disclosed to anyone or any organization for any reason, except for those reasons listed in sub-section 8(2) of the *Privacy Act*.

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For initiatives involving disruptive technology, this includes information found in departmental systems of record (ex. GCMS) that other organizations such as CBSA or CSIS can view. Regular information sharing may continue to occur between IRCC and partner organizations, however Memoranda of Understanding (MOUs), Information Sharing Agreements (ISAs) and other formal agreements must be updated and modified through the appropriate channels if there is the desire to disclose outputs on a regular basis.

Disclosure – Mechanisms that are in place to reduce the risk of inappropriate disclosure of the data, outputs and other model-related personal information. List GC partners and MOUs ISAs linked to this project as applicable.

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Safeguards

Personal information must be safeguarded appropriately regardless of the kind of technology applied to it. **Appropriate administrative, technical and physical safeguards should be applied to personal information at all stages of a disruptive technology initiative**, and consideration should be given to reducing the likelihood of privacy and security breaches throughout development.

Safeguards – Safeguards that are in place in and around the model to protect the data
--

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Retention and Disposal

Personal information used for an administrative purpose (as a part of a decision-making process that affects the individual) must be retained for at least two years, and in accordance with the appropriate Retention and Disposition Schedule. All data (with the exception of training data in the Exploration Zone) must be kept such that in the event of a complaint or legal action, the decision can be replicated. The data in the Exploration Zone that is an exact duplicate of production data and that is used to generate and retrain model rules can be considered transitory.

Retention and Disposition schedules	
Training Data in EZ	
Client Input Data (during production)	
Model Outputs	

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Model (the code)
Reports (outputs for officers, legal tables, others as appropriate)

Monitoring Plan

Monitoring for privacy compliance to the above-noted requirements should be built in from the model development phase and a monitoring schedule post-deployment should be followed.

In addition to being certain that the disruptive technology is working properly, here is a list of non-exhaustive monitoring activities to plan for:

- **Collection:** Make sure no data from sources other than departmental systems of record (ex. GCMS) and other IRCC data repositories are included in the disruptive technology, and if there is outside data, put in place the appropriate ISA or MOU and keep these up to date.
- **Notice:** Review privacy notices and transparency and explainability practices for accuracy and for current information. Update when required.
- **Retention and Disposal:** Review the retention and disposal practices and ensure that no information is retained beyond IRCC's prescribed retention period.
- **Accuracy:** Build in regular data quality practices to ensure data is accurate, up to date and as complete as possible, and modify the information when required.

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- **Use:** Review data handling practices, ensure mitigation measures against inappropriate use are functioning properly, employ new measures as required, and update practices periodically.
- **Disclosure:** Review disclosure practices so that disclosures are occurring as a part of up to date MOUs and/or ISAs, and ensure other government organizations can only see information they are permitted to see in GCMS under those MOUs/ISAs. Make modifications when required.
- **Safeguards:** Complete the mandatory IT Security Assessment and Authorization process and conduct security checks to confirm that the training data, the technology itself and the outputs are secure.

Monitoring – Monitoring for privacy compliance once the model is in production. Please describe the steps you will follow to develop and establish the required monitoring plan.

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s.16(1)(b)

s.16(1)(c)

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Monitoring Notes:

The quality assurance and monitoring plans will monitor the ongoing efficacy of the model and of the data quality. The quality assurance and monitoring activities will contribute to monitoring the Accuracy and Use privacy requirements. At the time of completing this document, a detailed plan to monitor all of the privacy requirements was not in place. However, the measures that are in place should mitigate many potential privacy risks in the future (such as encrypting data, limiting access to only those with a ‘need to know’ etc.) This model will be in a pilot mode from June 2021 to October 2021, and many assessments will take place during that time. Building in additional privacy controls may occur during the pilot and they will be recorded in future versions of this document.

As of June 2, 2021, a formal plan to monitor the privacy requirements for the Lighthouse model has not been completed.

Gap Analysis and Proposed Recommendations

Requirement	Gap	Proposed Recommendation	Status
Retention and Disposal	No clear retention and disposal schedules have been determined.	Meet with IM to determine a retention and disposal schedule for all Lighthouse data.	Not begun – to engage with IM in the coming weeks

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Monitoring	A clear plan to monitor the effectiveness of privacy controls and adherence to privacy requirements.	Currently quality assurance mechanisms are in place to monitor the accuracy and effectiveness of the model. However, Privacy recommends that a more detailed monitoring plan be developed to monitor adherence to privacy requirements or include it in existing documentation.	Not begun
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Documents Reviewed to Gather Information

The documents below are linked to their source in GCDOCS. As future readers of this MPA may not have access to those documents, below is a point-in-time capture of the documents as of May 20, 2021. Because they are point-in-time, note that they may be drafts, so please use the hyperlink when possible.

1. Lighthouse Privacy Needs Assessment -

<http://gcdocs2/otcs/cs.exe?func=ll&objaction=overview&objid=392470772>



A2SC - PNA -
Lighthouse for SP.docx

2. Lighthouse Project Charter -

<http://gcdocs2/otcs/cs.exe?func=ll&objaction=overview&objid=389516701>

Model Privacy Assessment

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A25C - Project
Charter - Lighthouse

3. Lighthouse Study Permit Pilot Legal Opinion -

<http://gcdocs2/otcs/cs.exe?func=ll&objaction=overview&objid=392337429>



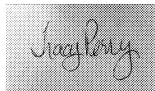
Lighthouse Study
Permit Pilot Legal Op

Signature



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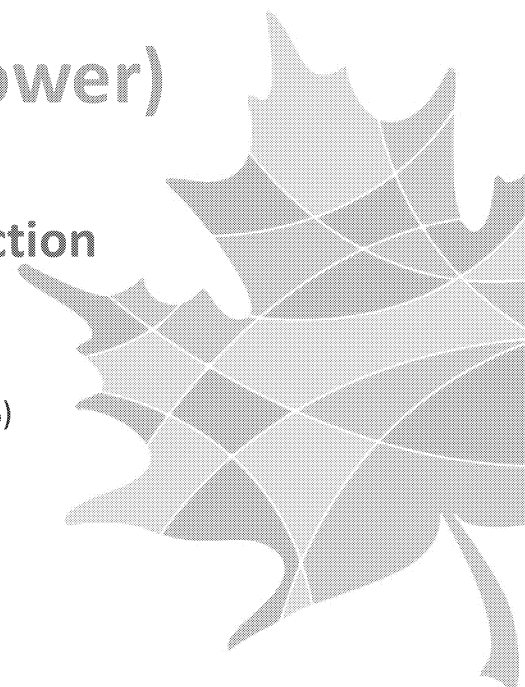


Tracy Perry
ATIP Director
Signed by: Perry, Tracy

Lighthouse (aka Watchtower) Project Updates Global Risk & Fraud Pattern Detection

Advanced Analytics Solutions Centre (A²SC-OPPB)

September 2021



Purpose

1. Provide an overview of the A2SC-developed Lighthouse (previously known as Watchtower) Risk Identification System.
2. Outline plans for an operational pilot project, testing the use of the tool to improve program integrity and fraud detection efficiency in the global Student Permit (SP) caseload.

What is Lighthouse (a.k.a. Watchtower)?

Lighthouse is a prototype system that automatically and comprehensively extracts risk and fraud patterns from data, providing timely and actionable information to IRCC.

It DOES NOT recommend or make an administrative decision about a client.

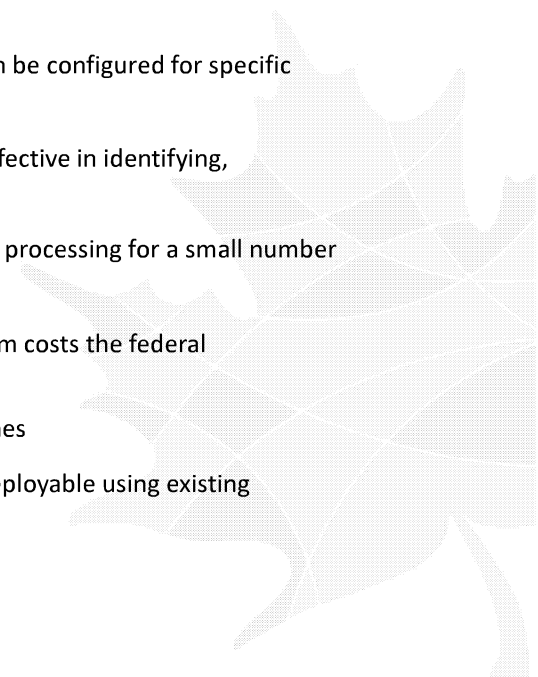
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Value proposition

Flexible	Can be adapted to other IRCC business lines
Comprehensive	Can scan for many forms of data-detectable risk patterns, and can be configured for specific countries or risk types (e.g., misrep, organized crime, etc.)
Effective	Enables RAUs and investigative teams to be more efficient and effective in identifying, validating and taking action on fraud and risk patterns
Improve Processing	Improves timeliness of verifications, thereby preventing delays in processing for a small number of files
Cost savings	Cost avoidance from fewer adverse events (e.g., each asylum claim costs the federal government roughly \$16,000)
Complementary	Dovetails with existing intelligence-based risk detection approaches
Inexpensive	Modest costs for development and maintenance. Immediately deployable using existing infrastructure



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s. 16(1)(b)
s. 16(1)(c)

System complements human decision making

System provide neutral, factual information to increase evidence available to officers

- Lighthouse only provides information to support RAO decisions about when to collect additional evidence.
- No decision automation.
- All data used by the system originates from GCMS

Key Design Principle:

Lighthouse does not automate decisions, and does not affect processing of bona fide applications

The pilot is designed to avoid fettering

- Lighthouse information is only provided to risk assessment units for their consideration.
- Adjudicating officers will not see Lighthouse risk patterns.

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ANNEX



Annex: Participating Teams

Engaged Stakeholders

Integrity Risk Management (IRM) – **Business Owner**

International Network (IN)

Domestic Network (DN)

Centralized Network (CN)

Immigration Program Guidance (IPG)

Legal Services (Department of Justice/LSU)

Privacy (ATIP)

Strategic Planning and Performance (SPP)



Annex: Mitigation of Bias/Discrimination

- A2SC goes to great lengths to ensure that Lighthouse is developed responsibly and does not introduce bias.
- Steps include:
 1. External review of Lighthouse by Statistics Canada
 2. Following best practices in data science to avoid bias and active monitoring of risk indicators
 3. Many layers of human review of the risk patterns to eliminate incremental bias
 4. Overall design centred on the interests of the client to avoid causing harm
 5. Active engagement with external stakeholders, including governance exercise in Winter 2020
 6. Follow the comprehensive ethics framework to govern AA work

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Watchtower System Design

Advanced Analytics Solution Centre (A²SC)
November 2020

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

AGENDA

Basic Operation

Data

- a) Overview**
- b) Inputs**
- c) Adverse Targets**
- d) Contextual Information**

System Configuration

ANNEX: System Design

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Key Question for Project Team

**What role, if any, should governance play
in these system design choices?**

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Meeting Instructions

1. CHAT FEATURE IN MS TEAMS

** Throughout this meeting, please post any questions, comments or considerations using the chat function in MS Teams as they arise during this meeting. These questions and comments will not be addressed directly in this session, but will be collected at the end of the meeting and used to frame subsequent project team discussions that will explore these issues in depth.*

2. ROUNDTABLE (3 pm)

One participant from each team will be asked to:

- 1) introduce themselves*
- 2) Identify their team's mandate as it relates to watchtower and*
- 3) list one thing they would like to see achieved by the end of this project.*

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

Watchtower

Process Design Project

Advanced Analytics Solution Centre (A²SC)
November 2020

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

Project Goals

- Engage Key IRCC Stakeholders for deeper involvement and understanding on watchtower.
- Design, Draft and Test draft usage and governance processes for the tool.
- Lay key groundwork to support continued development of the tool at IRCC.

IN SCOPE

- Usage and governance
- Legal and privacy considerations
- Risk Identification/Mitigation

OUT OF SCOPE

- Technical design / development (user interface, etc.), with possible rare exceptions
- Areas covered by existing governance or operating procedures for risk assessment.

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

Artefacts

Governance Framework

- Authorities, approvals, key decision-points, etc.

Usage Processes

- Documentation, officer instructions, retention, etc.

Legal & Privacy Opinions

- Possible updates to existing documents/drafts.

Project Risk Assessment / Mitigation Plan

Considerations Report

- “Parking Lot” for issues outside the scope of this project

Project Report

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

Project Structure

Up to 12 weeks in length

Weekly project team meetings (1-hour)

Meetings will be a mix of:

- structured brainstorming sessions
- “in the weeds” working/design sessions; and
- presentations/demos

A2SC to act as convenor/facilitator

Non-administrative test run of watchtower will be used to frame project

Project Team: OPPB (A2SC), IRM, IPG, CN, DN, IN, Legal, Privacy, SPP, CMB, Admissibility

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

Watchtower Risk Identification Tool

**Advanced Analytics Solution Centre (A²SC)
November 2020**

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

s.16(1)(b)

s.16(1)(c)

Watchtower

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

**Pages 230 to / à 334
are withheld pursuant to sections
sont retenues en vertu des articles**

s.16(1)(b), s.16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

DEMO

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

RoundTable

1) Introduce yourself (and any others participating from your team)

2) Identify your team's mandate as it relates to watchtower

3) One thing you would like to see achieved through this project

A2SC, IRM, IPG, CN, DN, IN, Legal, Privacy, SPP, CMB, Admissibility

Internal IRCC use only. Please consult the Advanced Analytics Solutions Centre, IRCC, prior to disclosure under Access to Information.

Page 233

**is withheld pursuant to sections
est retenue en vertu des articles**

16(1)(b), 16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

**Pages 234 to / à 339
are withheld pursuant to sections
sont retenues en vertu des articles**

s.16(1)(b), s.16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

**Pages 235 to / à 343
are withheld pursuant to sections
sont retenues en vertu des articles**

s.16(1)(b), s.16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

**Pages 236 to / à 346
are withheld pursuant to sections
sont retenues en vertu des articles**

s.16(1)(b), s.16(1)(c)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

Privacy Needs Assessment for Watchtower Global SP Pilots

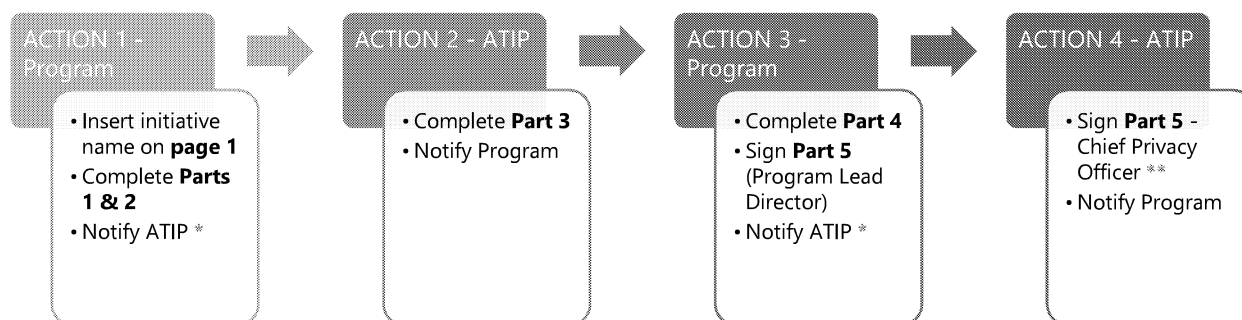
This document serves as a tool for the Department to assess the privacy needs for your initiative, document your program area's commitment to taking appropriate steps to protect privacy in your initiative, and to prioritize it in IRCC's privacy work plan. Based on this assessment, we may determine that no privacy work is required, or we may recommend:

- the development of a new Privacy Impact Assessment (PIA);
- an amendment or update to one or more existing PIAs or
- other privacy work, as appropriate.

It is essential that you provide accurate and complete information so that we can provide the most appropriate recommendations and optimal support.

Instructions and Responsibilities

Steps to complete the PNA Document



* Send the document to the [ATIP Division](#).

** In cases where Privacy Compliance Evaluation (PCE) is being sought, you must obtain the signature of ADM Corporate Services Sector

Part 1 – General Information

The information provided in this section will be used to:

- better understand your initiative and how it aligns with departmental priorities; and
- prioritize our review and support of your initiative in a manner commensurate with its complexity and risk.

Initiative Business Owner

Sector/Branch/Division	IN, CN and DN
Director	Ellie Weber (CN)
Program area contact	Joshua Parkinson (CN)

s.16(1)(b)

s.16(1)(c)

ATIP File #P20XXXX-XX

Description

Describe your initiative:

- What is the purpose? How will the initiative operate?
- How will the personal information be used? Specify whether personal information is being used to make decisions that directly affects individuals.
- Is this a new program or a modification to an existing one?
 - If it is a modification to an existing program, select from the options below, and be sure to describe both the existing program AND the proposed modifications

Does the initiative involve any of the following changes to current methods for handling personal information?

<input type="checkbox"/>	Increased collection, use or disclosure	<input type="checkbox"/>	Changing from paper-based to electronic	<input type="checkbox"/>	Changing from manual to systematic disclosure
<input type="checkbox"/>	New information sharing partners	<input type="checkbox"/>	Increased or changed target population	<input checked="" type="checkbox"/>	New or enhanced technologies
<input type="checkbox"/>	Changing from direct to indirect collection	<input type="checkbox"/>	Enhanced investigation or surveillance	<input type="checkbox"/>	Other

Alignment with IRCC's Departmental Results Framework

Identify all program activities in which the initiative is incorporated. If the information cannot be provided, only check the "Unsure" option at the bottom of the table below.

IRCC CORE RESPONSIBILITIES & PROGRAM ACTIVITIES (Check <u>all</u> applicable ones)			
Visitors, International Students and Temporary Workers	Immigrant and Refugee Selection and Integration	Citizenship and Passports	Internal Services
<input type="checkbox"/> Visitors <input checked="" type="checkbox"/> International Students <input type="checkbox"/> Temporary Workers	<input type="checkbox"/> Federal Economic Immigration <input type="checkbox"/> Provincial Economic Immigration <input type="checkbox"/> Family Reunification <input type="checkbox"/> Humanitarian / Compassionate & Discretionary Immigration <input type="checkbox"/> Refugee Resettlement <input type="checkbox"/> Asylum <input type="checkbox"/> Settlement	<input type="checkbox"/> Citizenship <input type="checkbox"/> Passport	<input type="checkbox"/> Acquisition Services <input type="checkbox"/> Communications Services <input type="checkbox"/> Financial Management Services <input type="checkbox"/> Human Resources Management Services <input type="checkbox"/> Information Management Services <input type="checkbox"/> Information Technology Services <input type="checkbox"/> Legal Services <input type="checkbox"/> Management & Oversight Services <input type="checkbox"/> Material Services <input type="checkbox"/> Real Property Services <input type="checkbox"/> Travel & Other Administrative Services
<input type="checkbox"/> Unsure (Provide a brief explanation):			

Alignment with Sector / IRCC / Government of Canada Priorities

Indicate if the initiative is linked to one or more sector, departmental or government of Canada priorities.

☐ No

☒ Yes ~ Describe the priority and provide links

"Manage increased temporary resident volumes while advancing transformation", IRCC 2018-2021 Integrated Plan, p. 5

Timelines for Implementation

Provide the timeline for the initiative. Specify the start and end dates. If there is no end date, please specify whether the initiative is permanent, has no end date or the end date is unknown.

Pilot will run for a limited time:

☒ This initiative is a pilot project

COVID-19 Impact

Specify if the initiative is related to COVID-19. The Privacy Compliance Evaluation (PCE) is a streamlined way of conducting a privacy analysis for urgent COVID-related initiatives in lieu of a full PIA.

☒ No

☐ Yes (Provide a brief explanation below)

☐ This COVID-related initiative continues beyond March 31, 2021.

If **not**, indicate the end date below.

Related Privacy Impact Assessments

To your knowledge, are there any PIAs (completed or ongoing) related to this initiative or activity? If you are aware of PIAs related to similar initiatives at other federal departments, please include them as well.

☐ Unknown
 ☐ No
 ☒ Yes

If **yes**, indicate below the titles of the other PIAs related to this one by specifying for each whether it is completed or still ongoing.

A2SC completed a PIA for its use of advanced analytics in support of TRVs from China and India ("Privacy Impact Assessment: Use of Advanced Analytics in IRCC Programs"). The work proposed here is very closely related.

Part 2 – Initial Privacy Considerations

Legal Authorities for Collection

The *Privacy Act* requires institutions to ensure there is **parliamentary authority** for the program or activity for which the personal information is collected, used and disclosed. Such authority is usually contained in:

- an Act of Parliament or subsequent Regulations;
- an approval of expenditures proposed in the Estimates and as authorized by an appropriation Act or;
- activities conducted as part of the administration of the program.

Identify the relevant authorities in the table below. We have included common legislative authorities at IRCC as examples.

Note: The *Privacy Act* is not a legislative authority for the collection or creation of personal information.

SOME COMMON LEGISLATIVE AUTHORITIES	SPECIFIC SECTION(S)
<i>The Department of Citizenship and Immigration Act</i>	
<i>The Immigration and Refugee Protection Act</i>	186.1(1) and 186.1(5)
<i>The Immigration and Refugee Protection Regulations</i>	
<i>Citizenship Act</i>	
<i>Citizenship Regulations</i>	
<i>Canadian Passport Order</i>	
<i>Financial Administration Act (for Internal Services) *</i>	
<i>Insert other legislation if applicable...</i>	

* For internal service programs that draw authority from the *Financial Administration Act*, you must also specify which policies apply to the programs. Government of Canada policies can be found at: <https://www.tbs-sct.gc.ca/pol/index-eng.aspx>

Does this initiative require new legislation or an amendment to an existing piece of legislation?

- ☒ No
 ☐ Unknown
 ☐ Yes (Please describe below)

Identifying a Personal Information Bank (PIB)

What is the Personal Information Bank (PIB) for your program or activity? Please select one of the options:

- ☐ Unknown
☐ A new PIB will need to be developed
☒ There is an existing PIB. Please list the name and number below.

Two PIBs were updated to include computer analytics:

- Migration Control and Security Management (PPU 068)
- International Students (PPU 051)

Elements of Personal Information/Data Involved

From the non-exhaustive listing of possible data elements below, indicate all applicable data elements collected or created in the initiative by checking the box attached.

- ☒ Not Applicable (no new collection of personal information)

Personal Information Categories			
<input type="checkbox"/>	Contact information (name, phone number(s), mailing address, e-mail address)	<input type="checkbox"/>	Passport information
<input type="checkbox"/>	Physical attributes	<input type="checkbox"/>	Biometric information (photo, fingerprint, etc.)
<input type="checkbox"/>	Biographical	<input type="checkbox"/>	Medical/health information
<input type="checkbox"/>	Opinions or views	<input type="checkbox"/>	Financial information
<input type="checkbox"/>	Unique identifier (UCI, SIN, PRI) or equivalent number	<input type="checkbox"/>	Employment information
<input type="checkbox"/>	Immigration, Citizenship or Passport status	<input type="checkbox"/>	Criminal information
<input type="checkbox"/>	Immigration information	<input type="checkbox"/>	National security history or information
<input type="checkbox"/>	Citizenship information	<input type="checkbox"/>	

If **necessary**, add below any other applicable data elements.

Partnerships

Other than the employees within the program area responsible for the initiative, indicate all partners involved in the handling of personal information/data throughout the life of this initiative and the nature of their involvement, whether fully or partially.

This includes other IRCC branches/divisions, other federal departments, municipal, provincial/territorial governments, foreign governments, foreign organizations, private organizations, etc.

☐ Not Applicable

PARTNERS	RESPONSIBILITIES (specify by adding an "X" (copy/paste) at the corresponding one)				
	Collection	Access	Retention (storage)	Disposal	Other (specify)
A2SC		X	X	X	Analysis
IRM		X			Governance
Provide a brief description of how each responsibility is fulfilled: Identify MOUs or other similar instruments that currently govern the sharing or are under negotiation.					
IRM is currently drafting a governance and risk mitigation framework for Watchtower.					

Other Considerations

Indicate if the initiative involves any of the following:			
<input checked="" type="checkbox"/>	Information belonging to another organization	<input type="checkbox"/>	Data matching ~ personal information from one database is linked or combined with personal information from another database
<input type="checkbox"/>	Publicly available information	<input type="checkbox"/>	Statutory Prohibitions
<input type="checkbox"/>	Cloud computing	<input checked="" type="checkbox"/>	Complex System Access or Storage*
<input type="checkbox"/>	Chat bots	<input type="checkbox"/>	Active or passive surveillance, monitoring or investigation
<input checked="" type="checkbox"/>	Analytics	<input type="checkbox"/>	Audio or video recording for quality control
<input type="checkbox"/>	Artificial intelligence	<input type="checkbox"/>	Other
<input type="checkbox"/>	Social media	<input type="checkbox"/>	None of the above
<input type="checkbox"/>	Web scraping ~ web data extraction		

* Information of partners is stored in a system where different parties have access, information of multiple programs are saved in the same system, or parties other than IRCC have been given or will be given access to a system containing IRCC information - GCMS meets all three criteria, as an example

If you check any of the above boxes, elaborate below.

Privacy Concerns

Is it anticipated that the public or departmental employees will have any privacy concerns regarding the proposed program or service?

☐ Yes (Please describe below)

☐ No

☒ Unknown

Part 3 - ATIP Needs Assessment

Clarification is required before a recommendation can be made

☐ Yes

☐ No

A new or modified PIA is required

☐ Yes

☐ No

A new or modified privacy protocol is required

☐ Yes

☐ No

Limited privacy work is required

☐ Yes

☐ No

No privacy work is required at this time

☐ Yes

☐ No

ATIP Recommendation and Rationale

Part 4 - Program Decision

☐ We concur with the assessment and will follow the ATIP Division's recommendations.

-OR-

☐ We do not concur with the assessment and will not follow the ATIP Division's recommendations.

Describe what actions you will take instead of the ATIP Division recommendations.

-OR-

In cases where a PIA is required, but the initiative is **COVID-related and the urgency** will prevent the department from submitting a PIA prior to implementation, the Treasury Board of Canada Secretariat (TBS) has issued an [Interim Directive on Privacy Impact Assessment](#) to address the challenges initiatives might deal with while complying with privacy law and rules. This Interim Directive (section 6.4) allows, in **exceptional circumstances**, the completion of a Privacy Compliance Evaluation (PCE) in lieu of a full PIA, as a streamlined way of conducting a privacy analysis for **urgent COVID-related initiatives**.

For COVID-related initiatives that end by March 31, 2021:

☐ Because of the urgency of the initiative, we are seeking approval from the ADM Corporate Services Sector to complete a PCE (in lieu of a PIA) prior to implementation.

For COVID-related initiatives that continue past March 31, 2021:

☐ Because of the urgency of the initiative, we are seeking approval from the ADM Corporate Services Sector to complete a PCE (in lieu of a PIA) prior to implementation. We commit to completing a PIA before September 30, 2021, in addition to the PCE.

Justification for the PCE

Explain the urgency of the initiative and demonstrate why a PIA cannot be completed prior to implementation.

Part 5 - Record of Sign-Off

Signature instructions

- (1) Right-click on the signature block & select the option "Signature Setup..."
- (2) Go to "Suggested signer": replace the current content with the complete name of the Program Director
- (3) Go to "Suggested signer's title": replace "[Division Name]" with the official name of your Division
- (4) Click on "OK"
- (5) Right-click on the signature block & select the option "Sign"

X

[Program Lead Name]
Program Lead Director, [Division Name]

X

Simon Cardinal
Chief Privacy Officer

For Covid-related Initiatives

I authorize the program area to complete a PCE in lieu of a PIA (as identified in Part 4).

☐ Yes ☐ No

X

Holly Flowers Code
A/ADM, Corporate Services